

PROPOSED DECISION

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Decision **PROPOSED DECISION OF ALJ YACKNIN** (Mailed 10/6/2015)

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

In the Matter of the Application of Southern California Edison Company (U 338-E) for a Permit to Construct Electrical Facilities with Voltages Between 50 kV and 200 kV: Santa Barbara County Reliability Project.

Application 12-10-018
(Filed October 26, 2012)

**DECISION GRANTING PERMIT TO CONSTRUCT THE
SANTA BARBARA COUNTY RELIABILITY PROJECT**

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ATTACHMENT – Santa Barbara County Reliability Project
Mitigation Monitoring Plan

DECISION GRANTING PERMIT TO CONSTRUCT THE SANTA BARBARA COUNTY RELIABILITY PROJECT

1. Summary

This decision grants Southern California Edison Company (SCE) a permit to construct the Santa Barbara County Reliability Project to reconductor the existing 66 kilovolt (kV) subtransmission lines serving the Santa Barbara South Coast Electrical Needs Area (ENA), subject to the mitigation identified in the Mitigation Monitoring Plan.¹ Although such mitigation will not avoid the project's significant adverse impacts on air quality and noise during project construction, the need to provide better back-up support to the two 220 kV transmission lines serving the ENA is an overriding consideration meriting project approval.

This decision further determines that, as designed when SCE commenced construction in 1999, the project was exempt from the permitting requirements of General Order 131-D for being located entirely within existing rights of way.

2. Pre-application History

Southern California Edison Company (SCE) commenced construction of the project in 1999 without obtaining a permit to construct from this Commission, based on its interpretation at the time that the project was exempt from General Order (GO) 131-D's permitting requirements pursuant to Section III.B.1.b (Exemption b), which exempts "the replacement of existing

¹ The attached Mitigation Monitoring Plan includes all revisions made in the Environmental Impact Report and its errata but omits the editing notations shown in those documents.

power line facilities or supporting structures with equivalent facilities or structures.”²

SCE also believed that the project was exempt from local coastal permitting regulations requiring a local Coastal Development Permit (CDP) from the County of Santa Barbara. SCE stopped construction in 2005 after members of the public raised concerns questioning such exemption, and SCE ultimately agreed to apply for a local coastal development permit. By that time, it had largely completed about half of the project work, including the replacement of 49 wood subtransmission poles with taller galvanized metal poles along “Segment 3A” between Carpinteria and the Ventura County border.

In 2010, after SCE’s application to the County was deemed complete and the County had begun work on the environmental review of the project, the County questioned whether the project was exempt from requiring a permit from this Commission. SCE contacted the Commission’s Energy Division regarding this issue who, by letter dated April 8, 2011, advised SCE that the project did not qualify for Exemption b (or any other exemption) and directed SCE to file this application.³

3. Procedural Background

SCE filed this application on October 26, 2012. William and Valerie Kerstetter (Kerstetters) filed timely protests on November 26, 2012.

² At that time, the project was designed to be built entirely within existing rights of way. However, SCE did not at that time consider the applicability of Section III.B.1.g, which exempts “power line facilities or substations to be located in an existing franchise, road-widening setback easement, or public utility easement {....}.”

³ By this time, the project design had been refined with the result that some of the project would be built outside of existing rights of way.

The Commission's Energy Division issued a draft environmental impact report on the proposed project on September 26, 2014.

A prehearing conference was conducted on January 30, 2015, in Carpinteria, California. No party other than the applicant appeared, and no other person appeared to move for party status. The assigned Commissioner's February 13, 2015, scoping memo identified the issues to be determined, and set a schedule providing for the taking of evidence and closing briefs, with closing briefs filed after the receipt of the final Environmental Impact Report (EIR).

The parties stipulated to the admission of prepared testimony without cross-examination, and the exhibits, including the final EIR (issued on May 18, 2015) and an initial errata to the EIR (issued on May 27, 2015), were received into evidence by ruling dated June 4, 2015. Opening briefs were filed on June 30, 2015. A second errata to the EIR (issued on July 28, 2015) was received into evidence by ruling dated July 29, 2015. Reply briefs were filed on August 14, 2015, upon which the matter was submitted.⁴

4. Issues

The issues in the proceeding, as determined by the assigned Commissioner's scoping memo, are:

1. What are the significant adverse environmental impacts of the proposed project? This issue encompasses consideration of whether the project design comport with Commission rules and regulations and other applicable standards governing safe and reliable operations.
2. Are there potentially feasible mitigation measures or project alternatives that will avoid or lessen the significant adverse environmental impacts? This issue encompasses consideration

⁴ The EIR, initial errata, and second errata have been marked for identification as reference Exhibits A, B, and C, respectively.

of how to design the proposed project in a manner that ensures its safe and reliable operations.

3. As between the proposed project and the project alternatives, which is environmentally superior?
4. Are the mitigation measures or project alternatives infeasible?
5. To the extent that the proposed project and/or project alternatives result in significant and unavoidable adverse environmental impacts, are there overriding considerations that nevertheless merit Commission approval of the proposed project or project alternative?
6. Was the EIR completed in compliance with California Environmental Quality Act (CEQA), did the Commission review and consider the EIR prior to approving the project or a project alternative, and does the EIR reflect the Commission's independent judgment?
7. Is the proposed project and/or project alternative designed in compliance with the Commission's policies governing the mitigation of Electric and Magnetic Fields (EMF) effects using low-cost and no-cost measures?
8. Did SCE violate GO 131-D by commencing construction of the project without a permit to construct?
9. If so, should SCE be sanctioned for its violation of GO 131-D? This issue encompasses consideration of Pub. Util. Code § 2107,⁵ which sets a \$500 minimum and a \$50,000 maximum fine for each offense, and Section 2108, which provides that every day is a separate offense. It also encompasses consideration of the six factors to consider in assessing fines, as identified in the Affiliate Rulemaking Decision, Decision (D.) 98-12-075, as follows:
 - a. How many days did each violation continue?
 - b. What harm was caused by virtue of the violations? This includes harm to the environment and harm to the integrity of the regulatory process.

⁵ Unless otherwise stated, all section references are to the Public Utilities Code.

- c. What was the utility's conduct in preventing, detecting, correcting, disclosing and rectifying the violation?
 - d. What amount of fine will achieve the objective of deterrence?
 - e. What fine or sanction has the Commission imposed under reasonably comparable factual circumstances?
 - f. Under the totality of these circumstances, and evaluating the harm from the perspective of the public interest, what is the appropriate fine or sanction?
10. If so, should SCE be required to mitigate the impacts of the prior unpermitted activity pursuant to the Commission's authority under Sections 761 and 762?

5. Environmental Impacts of Proposed Project

The EIR determined that the proposed project would not have any significant environmental impacts that cannot be mitigated to a less than significant level with the mitigation measures identified in the Mitigation Monitoring Plan other than short-term construction-related impacts on air quality. Specifically, the proposed project would have no impact or a less than significant impact on agricultural resources, greenhouse gas, hydrology and water quality, land use and planning, and population and housing. The proposed project would have impacts to aesthetics, biological resources, cultural and paleontological resources, geology, soils and mineral resources, hazards and hazardous materials, public services and utilities, recreation, and transportation and traffic that can be mitigated to less than significant with the mitigation measures identified in the Mitigation Monitoring Plan, as discussed more fully below. As also discussed below, while the proposed project's impacts on air quality can be mitigated with the mitigation measures identified in the Mitigation Monitoring Plan, they cannot be avoided.

5.1. Aesthetics

Construction activities could result in substantial damage to scenic resources and substantially degrade the existing visual character or quality of the site and its surroundings. These construction activities include the use of vehicles and equipment for construction activities; soil and vegetation removal at new structure sites and for access roads; temporary outdoor storage of materials; and helicopter activities for transporting workers, materials and equipment and for placing and installing structures and hardware. In addition, the new transmission structures could create a new source of substantial light or glare.

These aesthetic impacts can be mitigated to less than significant with the mitigation identified in the Mitigation Monitoring Plan, including restoration of permanent disturbed areas to conditions that would blend with the overall landscape character; keeping construction sites clean and orderly and screening or storing materials and equipment from public view; using finish colors and/or surface applications and native vegetation to blend retaining walls with their surroundings; and using non-specular conductors and non-reflective finish on all new transmission structures.

5.2. Air Quality

Construction activities would result in the emission of reactive organic gases (ROG), nitrous oxides (NO_x), and particulate matter less than or equal to 10 micrometers in diameter (PM₁₀) and 2.5 micrometers in diameter (PM_{2.5}) in excess of applicable thresholds, and would result in a cumulatively considerable net increase in ROG, NO_x and PM₁₀ emissions within the Santa Barbara County Air Pollution Control District, which is a non-attainment region. These impacts can be mitigated, but not avoided, with the use of low emission engines for

off-road diesel vehicles and equipment as identified in the Mitigation Monitoring Plan.

5.3. Biological Resources

Construction activities could result in a substantial adverse effect special status plants and wildlife,⁶ special status natural communities,⁷ and federally protected wetlands.⁸ Grading or vegetation removal during operational inspection and maintenance activities could also impact special status species or habitat.

These impacts can be mitigated to less than significant with mitigation identified in the Mitigation Monitoring Plan, including clearly marking and restricting access to sensitive areas; conducting pre-construction surveys; developing and implementing a Noxious and Invasive Weed Control Plan; limiting the removal of native plants, trees, and natural communities; habitat restoration; implementing measures to prevent entrapment of wildlife; minimizing the potential for glare or spillover from night lighting; taking measures to reduce impacts on hydrologic features and aquatic habitat; taking additional measures to reduce potential impacts on California red-legged frog, nesting birds, burrowing owl, Southwestern willow flycatcher and Least Bell's

⁶ Special status plants and wildlife observed or known to be present in the project area include Santa Barbara honeysuckle, Nuttall's scrub oak, monarch butterflies, arroyo chub, steelhead, coast range newt, California red-legged frog, western pond turtle, coast horned lizard, two-striped garter snake, Cooper's hawk, golden eagle, northern harrier, white-tailed kite, bald eagle, loggerhead shrike, song sparrow, Least Bell's vireo, burrowing owl, southwestern willow flycatcher, American badger, ringtail, San Diego desert woodrat, mule deer, and mountain lion.

⁷ Special status natural communities in the project area include riparian communities, Southern California Black Walnut Woodland, Southern Coast Live Oak Riparian Forest, and Southern Sycamore Alder Riparian Woodland.

⁸ Fifteen streams in the project area were identified as jurisdictional.

vireo, and ringtail and American badger; and implementing these measures during operations and maintenance.

5.4. Cultural and Paleontological Resources

Construction activities could potentially cause a substantial adverse change in the significance of a historical or archeological resource, destroy a unique paleontological resource or site or unique geologic feature, or disturb human remains.

These potential impacts can be mitigated to less than significant with mitigation identified in the Mitigation Monitoring Plan, including the retention of qualified cultural resources and paleontological consultants who shall approve cultural resources and paleontological monitoring and treatment plans, conduct worker environmental awareness training, monitor construction, and report to the Commission summarizing all monitoring and mitigation activities.

5.5. Geology, Soils and Mineral Resources

Landslides are a potential hazard through most of the project area. The proposed project would therefore expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. This impact can be mitigated to less than significant with Mitigation Measure (MM) GEO-1 identified in the Mitigation Monitoring Plan, which requires SCE to conduct annual, or more often as needed, maintenance patrols to identify areas of active slope instability and submit an annual report to the Commission so that any areas of slope instability that could potentially affect project facilities can be addressed.

5.6. Hazards and Hazardous Materials

Although database searches of the list of hazardous materials sites compiled pursuant to Gov. Code § 65962.5 did not find any hazardous materials sites within 1,000 feet of project components, there is a minor potential for an

unrecorded hazardous materials site to be present. The resulting potential for a significant hazard to the public or the environment can be mitigated to less than significant with mitigation identified in the Mitigation Monitoring Plan requiring the applicant to prepare and implement a Contaminated Soil/Contingency Plan in case hazardous material is found on site.

Construction, Operation and Maintenance (O&M) of the proposed project would require temporary or single-lane closure of roadways, but impacts on traffic and transportation, including by emergency vehicles, can be mitigated to less than significant with mitigation identified in the Mitigation Monitoring Plan requiring the development and implementation of a Traffic Control Plan.

Several of the proposed project components are located in areas that are designated by Department of Forestry and Fire Protection as Very High Fire Hazard Severity Zones, where construction and O&M of the proposed project would increase fire risk. This impact can be reduced to less than significant with mitigation identified in the Mitigation Monitoring Plan requiring the development and implementation of a Fire Control and Emergency Response Plan.

5.7. Noise

Construction of the proposed project would cause noise levels to meet or exceed standards established by Santa Barbara County construction projects located in the vicinity of sensitive receptors. This impact can be reduced to less than significant with implementation of the mitigation in the Mitigation Monitoring Plan requiring the installation of a temporary noise attenuation barrier for construction activities in those areas.

5.8. Public Services and Utilities

As discussed previously, construction activities could increase the risk of fire. The risk of fire and unnecessary burden on local fire protection providers

can be mitigated to less than significant with mitigation identified in the Mitigation Monitoring Plan requiring the applicant to develop and implement a Fire Control and Emergency Response Plan, as discussed previously.

Due to California's current drought conditions, construction activities could result in insufficient water supply from existing entitlements. This impact can be reduced to less than significant with the implementation of mitigation identified in the Mitigation Monitoring Plan requiring the preparation of a Water Efficiency Plan and the use of reclaimed water to the extent feasible.

Project construction will generate 7213 tons of solid waste. Under Santa Barbara County's Environmental Threshold and Guidelines Manual, the impact of more than 350 tons of construction and demolition debris is considered a significant impact on public services. In addition, Ventura County Ordinance #4421 requires the diversion of a minimum 60% (by weight) of construction debris through either reuse or recycling. The impact of the generation of 7213 tons of solid waste can be mitigated to less than significant with mitigation identified in the Mitigation Monitoring Plan requiring the preparation and implementation of a Solid Waste Management Plan that complies with Ventura Ordinance #4421 and ensures that no more than 350 tons of solid waste is delivered to landfills operated by Santa Barbara County.

5.9. Recreation

Construction will require temporary closures or detours along the Ojai Valley Trail and Franklin Trail that would impact members of the public that use the trails. This impact can be mitigated to less than significant with mitigation identified in the Mitigation Monitoring Plan requiring SCE to provide the public with at least one week notice of potential closures.

5.10. Transportation and Traffic

Temporary lane closures and/or travel lane reductions during construction could cause short-term, temporary impacts on the performance of the traffic circulation system, the potential for traffic safety hazards, access to emergency access routes, and the performance or safety of bicycle and pedestrian facilities including the Ojai Valley Trail. These impacts can be mitigated to less than significant with mitigation identified in the Mitigation Monitoring Plan requiring SCE to develop and implement a Traffic Control Plan to provide the public with at least one week notice of potential closures and requiring SCE to repair any damage done to area trails.

The use of helicopters during construction could potentially result in accidents or incidents at job sites and at local airports. These impacts can be mitigated to less than significant with mitigation identified in the Mitigation Monitoring Plan requiring SCE to develop and conduct Helicopter Safety Plan and Worker Environmental Awareness training and to notify the Van Nuys Flight Standards District Office and residents, businesses and owners of property within the vicinity of planned helicopter activities.

6. Environmentally Superior Alternative

The EIR considers three project alternatives: Alternative A, which would reduce the scope of work by leaving existing 30 foundations and 17 topped subtransmission wood poles along Segments 1, 2 and 3A; Alternative B, which would install some structures along Segment 4 via helicopter; and the “No Project” Alternative, under which the project would not be built.

The proposed project is environmentally superior to the alternatives with respect to nine of the resources; Alternative A is environmentally superior to the proposed project and alternatives with respect to six resources (including air

quality), and Alternative B is environmentally superior to the proposed project and alternatives with respect to two resources.

Although Alternative A would have less of an impact on air quality than the proposed project, the difference is minimal as the majority of air quality impacts would result from project activities that would occur under both alternatives. On the other hand, the proposed project would provide the long-term environmental benefits of removing abandoned infrastructure and rehabilitating small portions of the project area. On balance, the proposed project is the environmentally superior alternative.

7. EIR Compliance with CEQA⁹

CEQA requires the lead agency to certify that the EIR was completed in compliance with CEQA, that the agency has reviewed and considered it prior to approving the project, and that the EIR reflects the agency's independent judgment.

The EIR was completed after notice and opportunity for public comment on the scope of the environmental review and the draft EIR, as required by CEQA. On April 13, 2013, the Commission's Energy Division published and distributed a Notice of Preparation (NOP) in accordance with the CEQA Guidelines to the State Clearinghouse; responsible and trustee agencies including 69 representatives of federal, state, regional, and local agencies and planning groups; members of six tribes; and over 380 individuals including property owners within 300 feet of the existing proposed project right of way and substations. The NOP solicited written and verbal comments on the EIR's scope during a 30-day comment period, and noticed a public scoping meeting;

⁹ We take up the issue of whether the EIR was completed in compliance with CEQA out of the sequence of issues as they were set forth in the scoping memo.

the public scoping meeting was also noticed in local newspapers. The public scoping meeting was conducted on May 7, 2013, in Carpinteria, California.

Energy Division issued and distributed the Notice of Availability of the draft EIR on September 26, 2014, and held a public informational meeting on October 29, 2014, in Carpinteria. Energy Division received oral comments from two people at the public meeting, and also received 10 written comment letters (including one from the Kerstetters' representative).

Energy Division issued the final EIR on May 18, 2015, and two errata to the EIR, the first on May 27, 2015, and the second on July 28, 2015. The final EIR documents all comments made on the draft EIR and responds to them, as required by CEQA. The EIR, as revised by the first and second errata, identifies the proposed project's significant and unavoidable environmental impacts, mitigation measures that will avoid or substantially lessen them, and the environmentally superior alternative.

We have reviewed and considered the information contained in the EIR, as well as parties' challenges to the adequacy of the EIR as discussed below. We find that substantial evidence supports the EIR's findings, and we certify that the EIR was completed in compliance with CEQA, that we have reviewed and considered the information contained in it, and that it reflects our independent judgment.

7.1. Adequacy of Project Description

The Kerstetters argue that the EIR fails to comply with CEQA because the project description improperly excludes existing infrastructure that had been installed before SCE stopped work in 2004. The Kerstetters concede that the Commission does not require an after-the-fact permit for the prior unpermitted work, but assert that CEQA nonetheless requires that the prior unpermitted work be included in the project description.

To the contrary, the “project” that is subject to environmental review pursuant to CEQA is the activity which is being approved and permitted. Specifically, CEQA Guideline § 15378 defines “project” in relevant part as follows:

- (a) “Project” means the whole of an action, which has the potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, **and** that is any of the following:¹⁰

[...]

- (3) An activity involving the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies.

[...]

- (c) The term “project” refers to the activity which is being approved

[....]

The Santa Barbara County Reliability Project does not involve the issuance of a permit for SCE to construct its prior unpermitted work. This application does not seek, and SCE is not required to obtain, approval for its prior unpermitted work. Hence, SCE’s prior unpermitted work is outside of the definition of “project” for purposes of CEQA. The exclusion of SCE’s prior unpermitted work from the project description complies with CEQA.

7.2. Adequacy of Baseline for Environmental Review

The Kerstetters next argue that the EIR fails to comply with CEQA because the baseline for the environmental review includes SCE’s prior

¹⁰ Emphasis added.

unpermitted work. To the contrary, CEQA Guideline § 15125(a) provides that the baseline “normally” consists of “the physical environmental conditions in the vicinity of the project, as they exist at the time ... environmental analysis is commenced.” SCE’s prior unpermitted work was part of the physical environmental conditions at the time that the EIR’s environmental analysis commenced and therefore properly included in the baseline.

As the EIR explains, there is ample legal precedent and authority for including SCE’s prior unpermitted work in the baseline for the project’s environmental review:

The comment notes, correctly, that CEQA Guidelines section 15125 provides that the baseline will “normally” constitute the physical environmental conditions in the vicinity of the project, as they exist at the time the NOP is published. The California Supreme Court and numerous courts of appeal have, thus, consistently maintained that ongoing activities occurring at the project site at the time CEQA review begins should be considered part of the existing conditions baseline. (See, e.g., *Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal.4th 310, 320-321 [CBE] [baseline must reflect “the ‘existing physical conditions in the affected area’, that is the ‘real conditions on the ground’, rather than the level of development that could or should have been present according to a plan or regulation”]; *In re Bay-Delta Programmatic EIR Coordinated Proceedings* (2008) 43 Cal.4th 1143, 1167-1168 [preexisting environmental problems in the Bay Delta were part of the baseline conditions].) The recent decision in *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439 is consistent with this line of holdings. There, the Supreme Court stated that a departure from the normal rule that baseline constitutes existing physical conditions can only “be justified by substantial evidence that analysis based on existing conditions would tend to be misleading or without informational value to EIR users. (*Id.* at 445.)

The general rule that ongoing activities should be treated as part of the baseline applies equally when the project includes renewal

of a permit or other approval for an existing facility, even though the facility was not previously reviewed under CEQA. (*Citizens for East Shore Parks v. California State Lands Comm'n* (2011) 202 Cal.App.4th 549, 557-558.) It also applies when the existing physical conditions violate current regulatory provisions. (*Id.* at 559; *Riverwatch v. County of San Diego* (1999) 76 Cal.App.4th 1428, 1452-1453; *Fat v. County of Sacramento* (2002) 97 Cal.App.4th 1270, 1270; *Eureka Citizens for a Responsible Government v. City of Eureka* (2007) 147 Cal.App.4th 357, 371.) Therefore, the fact that the facilities were constructed without a permit makes no difference for purposes of the CEQA analysis. In *Riverwatch v. County of San Diego*, the court found that the analysis of a mining operation seeking a permit appropriately included prior illegal development in the baseline. (*Riverwatch*, 76 Cal.App.4th at 1452-1453.) Similarly, in *Fat v. County of Sacramento*, the court upheld the County's choice of a baseline that included unauthorized development that had occurred over 30 years. (*Fat*, 97 Cal.App.4th at 1270.) The theory behind these holdings is that how present conditions came to be may be an issue for enforcement agencies, but it is irrelevant to CEQA baseline determinations.

(EIR, pp. M-24 – M-25.)

The Kerstetters counter that *League to Save Lake Tahoe v. Tahoe Reg'l Planning Agency*, (2010) 739 F.Supp.2d 1260, which rejected an agency's use of a baseline that included existing unauthorized buoys, supports its position that the existing unpermitted work should not be included in the baseline. To the contrary, *League to Save Lake Tahoe* was concerned with the environmental provisions of the Tahoe Regional Planning Compact, not with CEQA. (*Id.* at 1294-1295; see also, *Citizens for East Shore Parks*, 202 Cal.App.4th at 561-562, discussing the case in the context of CEQA.) Furthermore, the Ninth Circuit Court of Appeals subsequently vacated the district's court's conclusion that the Tahoe Regional Planning Agency had violated the Compact by excluding unauthorized buoys from the baseline in its environmental impact statement.

(*League to Save Lake Tahoe v. Tahoe Reg'l Planning Agency* (9th Cir.2012) 469 Fed.Appx. 621.)

The Kerstetters argue that including SCE's prior unpermitted work in the baseline is nevertheless inappropriate because "it is an inextricable part of the proposed project," it "would fail to compare the Project with the environment's state absent the project," it would "mislead[] the public as to the Project's true environmental impacts," and because "use of the pre-project (1998) conditions is the only way to accurately portray the impacts of the project." (Kerstetters opening brief, pp. 11-12, emphasis in the original.) To the contrary, notwithstanding the Kerstetters' insistence that it is otherwise, the prior unpermitted work is not part of the project pursuant to CEQA Guideline § 15378.

7.3. Issuance of Second Errata Without Recirculation

The Kerstetters argue that it constitutes prejudicial procedural error for the second errata to modify the EIR's Chapter 7 to strike the discussion describing the impact of the past work along Segment 3A on private views because this modification was made without the opportunity for public comment and without explanation. This argument is without merit.

First, while Chapter 7 offers an analysis of the environmental impacts from the past work within the Coastal Zone (Segment 3A), this analysis is not required by CEQA. The Energy Division conducted this analysis and included it in the EIR as a courtesy to Santa Barbara County, recognizing that development in the Coastal Zone requires the County's discretionary approval of a CDP that encompasses both the proposed project and the prior work in Segment 3A. As it would not be procedural error to omit this analysis in its entirety from the EIR, it would not be procedural error to modify the analysis without the opportunity for public comment. (See EIR, p. 7-1.)

Second, even if the analysis in Chapter 7 was required under CEQA, the stricken portion of the discussion was in fact subject to public comment. Indeed, it was SCE's public comment on the discussion that evidently led to its modification. SCE's comment took issue, not only with the draft EIR's purported "overstatement" of the contrast of dull grey poles against the surrounding environment, but also because the draft EIR improperly assessed the visual impact in the Shepherd Mesa area based on the impact on the residents' private views. (EIR, Appendix M, November 12, 2014, letter from SCE, pp. 12-13.) The final EIR responded by reaffirming its assessment that past work resulted in a significant impact; "however, text regarding private views under Impact AE-C has been modified." (EIR, Response to Comment 1-38, p. M-7.) However, the EIR inadvertently omitted the indicated changes to that text. (EIR, p. 7-5.) The second errata correct that omission.¹¹

The Kerstetters complain that the EIR (as modified by the second errata) fails to articulate any reason why it struck the paragraph addressing aesthetic impacts of poles located on private property between Shepard Mesa Road and

¹¹ It bears noting that, had the EIR included the changes that it indicated in Response to Comment 1-38, no further public comment would have been required under CEQA. Pursuant to CEQA Guideline § 15088.5(a), recirculation to allow comment on new "information" included in an EIR is not required unless it is "significant." The guideline defines the terms "information" and "significant" as follows:

As used in this section, the term 'information' can include changes in the project or environmental setting as well as additional data or other information. New information is not 'significant' unless the EIR is changed in a way that deprives the public of a meaningful way to comment upon a substantial adverse effect of the proposed project or a feasible way to avoid or mitigate such effect....

With regard to the issue at hand, the second errata does not include new information, and it does not change the EIR in a way that deprived the public of the opportunity to comment on the impact of the past work on visual impacts or a feasible way to avoid or mitigate such effect.

SR 192. To the contrary, the reasoning is evident from Comment 1-38, which states that the draft EIR improperly assessed the visual impact in the Shepherd Mesa area based on the impact on the residents' private views, and the Response to Comment 1-38, which states that modifications will be made to the text regarding private views.

7.4. Validity of MM BIO-14 and GEO-1

SCE argues that the EIR improperly includes two mitigation measures, MM BIO-14 and MM GEO-1. MM BIO-14 would require SCE to implement, during operations and maintenance activities that would require ground disturbance or vegetation clearance, the same mitigation measures as required during construction, and annually reporting to the Commission's Energy Division on where such activities were performed and documenting that the mitigation measures were implemented. MM GEO-1 would require SCE to conduct annual maintenance patrols to identify areas of active slope instability and to submit an annual report to the Commission.

SCE argues that MM BIO-14 and MM GEO-1 are invalid because the impacts they purport to mitigate would be less than significant even in the absence of mitigation.¹² To the contrary, the EIR documents that grading or vegetation removal during operations and maintenance could have a significant impact on special status species or habitat, and that the siting of project components on naturally unstable geologic units and soils with high erosion potential could have a significant impact by causing landslides. (EIR, as modified by the second errata (Ex. C) at 19-20.)

¹² See CEQA Guidelines § 15126.4(a)(3), "Mitigation measures are not required for effects which are not found to be significant."

SCE also argues that the mitigation measures are invalid because they would impose unreasonable and excessive burdens on SCE and potentially the Commission. We address these assertions in the context of the issue of infeasibility of mitigation measures, below.

8. Infeasibility of Mitigation Measures and/or Environmentally Superior Alternative

SCE objects that MM BIO-1 (1) would not lead to any additional protection of sensitive species during O&M work because any activities that would potentially impact sensitive species are already subject to compliance with various state and federal resource agencies' protective measures or permit requirements; (2) it could prevent SCE from performing necessary work in a timely manner, jeopardizing the continuity of service and public safety; and (3) it raises practicality concerns about what Commission staff or its consultants would enforce the measure.¹³ SCE similarly objects that MM GEO-1 (1) is redundant of operations and maintenance activities that SCE regularly takes pursuant to applicable laws (such as GO 95 and 165) and its own facilities inspection procedures to evaluate and alleviate slope stability concerns; and (2) it raises practicality concerns about what Commission staff would enforce the measure.

We find that MM BIO-14 and MM GEO-1 are infeasible for being impractical and unnecessary from a policy standpoint. The mitigation measures would impose special obligations with respect to a single project of a single utility, both on SCE and on Commission staff, even though SCE is already

¹³ Under the Commission's current organization, the Commission's Energy Division is responsible for overseeing compliance with mitigation measures imposed as conditions on the issuance of a permit to construct, while the Commission's Safety and Enforcement Division has general responsibility for overseeing compliance with other Commission orders.

subject to enforceable rules, regulations and practices that reasonably ensure the mitigation of biological and geologic impacts during O&M of the project. Thus, the mitigation measures would pose an undue burden, while the environmental harm that would be caused by omitting these mitigation measures is minimal.

No party claims, and we do not find, any other mitigation measures to be infeasible.

9. Overriding Considerations

The need for the Santa Barbara County Reliability Project is uncontested. The Santa Barbara South Coast Electrical Needs Area (ENA) includes approximately 82,700 metered customers in the “Goleta System” who are primarily served by power passing through Goleta Substation from two 220 kilovolt (kV) transmission lines that are co-located on the same set of lattice steel towers running through the hills of Ventura and Santa Barbara Counties. A failure of any of those towers, due to soil instability or other causes, would likely render both lines incapable of transmitting power.

There are demonstrated risks to continuity of service from the 220 kV lines. The area where they are located is prone to landslides. Heavy rainfall resulting from El Niño conditions in the late 1990s weakened soils and destabilized several of the footings supporting the structures carrying the co-located 220 kV lines. For example, during a significant rain event in early 1998, an SCE patrol crew noticed that footings on multiple towers had become so unstable due to underlying soil conditions that immediate emergency repairs were needed. The area is also prone to fires and earthquakes. For example, the 2008 “Gap Fire” resulted in several unplanned outages on both 220 kV lines. The 2013 “White Fire” did not render those lines inoperable, but had the potential to do so.

Three 66 kV lines serve the ENA as a back-up source in the event that the 220 kV lines would be out of service. However, the existing 66 kV lines can only provide about 100 megavolt amperes (MVA) as compared to the most recent peak demand forecast for the Goleta System of approximately 269 MVA. The project will increase the capacity of existing 66 kV lines to accommodate approximately 80 MVA more electrical load to the Goleta System.

We find that the need to increase the reliability of electrical service to the Goleta System is an overriding consideration that merits approval of the Santa Barbara County Reliability Project notwithstanding its unavoidable impact on air quality during construction.

10. EMF Compliance

The Commission has examined EMF impacts in several previous proceedings.¹⁴ We found the scientific evidence presented in those proceedings was uncertain as to the possible health effects of EMFs and we did not find it appropriate to adopt any related numerical standards. Because there is no agreement among scientists that exposure to EMFs creates any potential health risk, and because CEQA does not define or adopt any standards to address the potential health risk impacts of possible exposure to EMFs, the Commission does not consider magnetic fields in the context of CEQA and determination of environmental impacts.

However, recognizing that public concern remains, we do require, pursuant to GO 131-D, Section X.A, that all requests for a permit to construct include a description of the measures taken or proposed by the utility to reduce the potential for exposure to EMFs generated by the Proposed Project. We

¹⁴ See D.06-01-042 and D.93-11-013.

developed an interim policy that requires utilities, among other things, to identify the no-cost measures undertaken, and the low-cost measures implemented, to reduce the potential EMF impacts. The benchmark established for low-cost measures is 4% of the total budgeted project cost that results in an EMF reduction of at least 15% (as measured at the edge of the utility right-of-way).¹⁵

SCE filed a detailed Field Management Plan as Appendix F to its application. The Field Management Plan provides that the project will use phasing circuits to reduce magnetic field levels. Specifically, SCE proposes to utilize subtransmission structure heights that meet or exceed SCE's preferred EMF design criteria, utilize double-circuit construction that reduces spacing between circuits as compared with single-circuit constructions, arrange conductors for magnetic field reduction, and placing new substation electrical equipment away from the substation property lines closest to populated areas. SCE testifies that these design options meet SCE's EMF Design Guidelines filed with the Commission, as well as applicable national and State safety standards for new electric facilities. We concur and find that this design complies with the Commission's EMF decisions.

11. Violation of GO 131-D

11.1. Construction Without a Permit Pursuant to Section III

We consider whether SCE is in violation of GO 131-D for having commenced construction to reconductor the 66 kV subtransmission lines

¹⁵ SCE notes in testimony that the Commission's EMF policy is consistent with the World Health Organization's 2007 Environmental Health Criteria wherein it states, "Provided that the health, social and economic benefits of electric power are not compromised, implementing very low-cost precautionary procedures to reduced exposures is reasonable and warranted." (Ex. 1, pp. 38-39.)

without obtaining a permit to construct. GO 131-D requires electric public utilities to obtain a permit to construct electric power line facilities between 50 kV and 200 kV, subject to several exemptions, two of which are implicated here: Exemption b, which exempts “the replacement of existing power line facilities or supporting structures with equivalent facilities or structures,” and Section III.B.1.g (Exemption g), which exempts in relevant part “power line facilities or substations to be located in an existing franchise, road-widening setback easement, or public utility easement.”

SCE states that it began project construction in 1999 based on its reasonable interpretation at the time that the project was subject to Exemption b. SCE asserts that, as GO 131-D had been adopted only a few years earlier, there was little guidance available to assist it in interpreting how its exemptions were to be construed. SCE asserts that, in the absence of such guidance, it was reasonable to interpret Exemption b as analogous to CEQA Guidelines § 15302(c), which provides that a utility project would be exempt from CEQA review if it involved only the “[r]eplacement or reconstruction of existing utility systems and/or facilities involving negligible or no expansion of capacity.” SCE assumed at the time (and, in D.03-08-033, the Commission confirmed) that “capacity” was to be interpreted as “voltage” for purposes of GO 131-D. As the reconductoring project involved only the replacement of 66 kV conductors with new conductors at the same voltage and the replacement of some existing structures with new structures on the same properties, the project was exempt from CEQA review pursuant to CEQA Guidelines § 15302(c); SCE argues that it was reasonable for it to assume by analogy that it was likewise exempt from GO 131-D’s permitting requirement pursuant to Exemption b.

In addition, although it proceeded at the time on the assumption that the project was exempt pursuant to Exemption b, SCE asserts in hindsight that it

also could have proceeded under Exemption g because, at the time, the entirety of the project was designed to be built in existing rights of way. (The project design has since been refined to locate a small portion outside of existing rights of way.)

We concur that, as designed at the time SCE began construction in 1999, the project was exempt from GO 131-D's permitting requirement pursuant to Exemption g. Regardless of SCE's basis for declining to obtain a permit to construct at the time, it was not required to do so because the project was exempt pursuant to Exemption g. We find that SCE is not in violation of GO 131-D for commencing construction of the project without a permit to construct.

The Kerstetters object to this "post-hoc rationalization" for not finding SCE in violation of GO 131-D for commencing construction without a permit. However, the fact that it is "post-hoc" does not make it less correct.

The Kerstetters argue that Exemption g does not apply to any portion of a project on private fee land and, as such, is inapplicable to the project because Segment 3A is primarily located on private land. To the contrary, as the Commission has repeatedly determined, Exemption g applies to projects located within a utility's existing fee-owned rights of way. (*See, e.g.,* Resolutions E-4165, E-4225 and E-4243.) Exemption g applied to the project as it was designed at the start of construction.

The Kerstetters argue that the GO 131-D Section III.B.1 exemptions were rendered inapplicable by Section III.B.2.c, which provides that "the exemptions shall not apply when any of the conditions specified in CEQA Guidelines § 15300.2 exist: [...] there is a reasonable possibility that the activity will have a

significant effect on the environment due to unusual circumstances.”¹⁶ The Kerstetters assert that the fact that Segment 3A of the project route crosses the Coastal Zone, where visual resources are entitled to heightened protection under Santa Barbara County’s Local Coastal Plan, constitutes an “unusual circumstance” and that the EIR, by finding that the past work in Segment 3A caused a significant aesthetic impact, establishes that there was a “reasonable possibility” of a significant effect on the environment.

To the contrary, the EIR’s determination that the past work in Segment 3A resulted in a significant aesthetic impact is based in large part on the fact that, in 2003, the City of Carpinteria designated State Road 192/Casitas Pass Road as a potential future scenic highway. (EIR, p. 7-5.) While the presence of a designated scenic resource might give rise to a “reasonable possibility” of a significant aesthetic impact, it did not exist in 1999 when SCE commenced construction. Furthermore, the mere fact that a project is located in the Coastal Zone does not constitute an “unusual circumstance” requiring CEQA review, as demonstrated by the fact that the California Coastal Commission’s adopted guidelines exempt utility repair and reconstruction work from coastal development permitting.¹⁷ The record evidence does not support finding either a reasonable possibility that the activity will have a significant effect on the environment or unusual circumstances that would render exemptions inapplicable pursuant to Section III.B.2.c.

¹⁶ While the Kerstetters make this argument only with respect to Exemption b, we address it because the argument applies equally to Exemption g.

¹⁷ See *California Coastal Commission’s Repair, Maintenance and Utility Hook-Up Exclusions from Permit Requirements*, Section II.B.2.b, “A coastal permit is not required to maintain, replace, or modify existing overhead facilities, including the addition of equipment and wires to existing poles or other structures, right-of-way maintenance, and minor pole and equipment relocations....”

Because we find that the project, as designed at the start of construction, was exempt from GO 131-D's permitting requirements pursuant to Exemption g, we do not reach the issue of whether Exemption b also applied at the time.

11.2. Construction Without Notice Pursuant to Section XI

The Kerstetters, in their opening and reply briefs, assert that SCE violated GO 131-D by commencing construction without notice as required by Section XI. The time and place to identify this as an issue in the proceeding was in protest to the application and/or at the prehearing conference. The Kerstetters did not identify this issue in their protest, and they did not appear at the prehearing conference to identify it there. This issue is beyond the scope of the proceeding as determined by the assigned Commissioner's February 13, 2015, scoping memo.

The Kerstetters' untimely assertions highlight the prejudice that would be caused if we were to consider them at this late juncture. Although the Kerstetters fault SCE for not including in its testimony "any claims, let alone evidence, regarding the completing notice as required by Section XI" (Kerstetters opening brief, p.13), the scoping memo did not identify or thereby put SCE on notice that it should offer such evidence.¹⁸ Although the Kerstetters make the bald assertions that "SCE opted to commence and complete construction along Segment 3A without providing notice to a single third party" (Kerstetters opening brief, p. 37) and "SCE did not provide notice of the Project in accordance with its own internal mandate..." (Kerstetters reply brief, p. 29),

¹⁸ SCE did in fact offer testimony that would inform this issue. ("I recall that SCE posted notices about the Project at various places in and around at least some of the area where construction was planned to occur. Given the passage of time, records of those notices appear to no longer exist, but I distinctly remember that SCE did post some notices." (Ex. 1, p. 29:5-9.))

they did not offer any testimony or evidence in support of this factual assertion and SCE has not had an opportunity to refute it. We reject the Kerstetters' claim that SCE violated Section XI as it is untimely and beyond the scope of the proceeding.

12. Sanctions or Mitigation for Violation of GO 131-D

Because we do not find SCE in violation of GO 131-D for having commenced construction without a permit, we do not reach the issue of what sanctions or mitigation should be imposed as punishment or mitigation for such violation.

13. Comments on Proposed Decision

The proposed decision of Administrative Law Judge (ALJ) Hallie Yacknin in this matter was mailed to the parties in accordance with Pub. Util. Code § 311 and comments were allowed pursuant to Rule 14.3 of the Commission's Rules of Practice and Procedure. No Comments were filed.

14. Assignment of Proceeding

Commissioner Michel P. Florio is the assigned Commissioner and ALJ Hallie Yacknin is the presiding officer to the proceeding.

Findings of Fact

1. The proposed project would have no impact or a less than significant impact on agricultural resources, greenhouse gas, hydrology and water quality, land use and planning, and population and housing.
2. The proposed project would have impacts to aesthetics, biological resources, cultural and paleontological resources, geology, soils and mineral resources, hazards and hazardous materials, public services and utilities, recreation, and transportation and traffic that can be mitigated to less than

significant with the mitigation measures identified in the Mitigation Monitoring Plan.

3. Construction of the proposed project will have a significant impact on air quality that can be mitigated with the mitigation measures identified in the Mitigation Monitoring Plan, but not avoided.

4. The proposed project is the environmentally superior alternative.

5. The EIR documents that grading or vegetation removal during operations and maintenance could have a significant impact on special status species or habitat, and that the siting of project components on naturally unstable geologic units and soils with high erosion potential could have a significant impact by causing landslides

6. MM BIO-14 and MM GEO-1 would impose an undue burden on SCE and Commission staff, while the environmental harm that would be caused by omitting these mitigation measures is minimal.

7. There are demonstrated risks of failure of the towers that carry the two 220 kV transmission lines that are the primary source of power for the approximately 82,700 metered customers in the Goleta System, which event would likely render both lines incapable of transmitting power.

8. The three existing 66 kV lines that serve the ENA as a back-up source in the event that the 220 kV lines would be out of service can only provide about 100 MVA as compared to the most recent peak demand forecast for the Goleta System of approximately 269 MVA.

9. The project will increase the capacity of existing 66 kV lines to accommodate approximately 80 MVA more electrical load to the Goleta System.

10. SCE's field management plan incorporates all feasible no-cost and low-cost measures to reduce potential EMF impacts by utilizing subtransmission structure heights that meet or exceed SCE's preferred EMF design criteria,

utilizing double-circuit construction that reduces spacing between circuits as compared with single-circuit constructions, arranging conductors for magnetic field reduction, and placing new substation electrical equipment away from the substation property lines closest to populated areas.

11. At the time SCE commenced construction in 1999, the entirety of the project was designed to be built in existing rights of way.

12. The California Coastal Commission's adopted guidelines exempt utility repair and reconstruction work from coastal development permitting.

13. At the time SCE commenced construction in 1999, there were no designated scenic resources in the vicinity of Segment 3A that would give rise to a reasonable possibility that the project would have a significant aesthetic impact.

Conclusions of Law

1. The EIR's exclusion of SCE's prior unpermitted work from the project description complies with CEQA.

2. The EIR properly includes SCE's prior unpermitted work in the baseline for the project's environmental review.

3. The modification by the second errata to the EIR's discussion describing the impact of the past work along Segment 3A on private views does not require public review and comment under CEQA.

4. The EIR, as modified by the first and second errata, was completed in compliance with CEQA, the Commission has reviewed and considered the EIR prior to approving the proposed project, and the EIR reflects the Commission's independent judgment.

5. MM BIO-14 and MM GEO-1 are infeasible for being impractical and unnecessary from a policy standpoint.

6. The need to increase the reliability of electrical service to the Goleta System is an overriding consideration that merits approval of the Santa Barbara County Reliability Project notwithstanding its unavoidable impact on air quality during construction to less than significant with the mitigation measures identified in the Mitigation Monitoring Plan.

7. The proposed project is designed in compliance with the Commission's policies governing the mitigation of EMF effects using low-cost and no-cost measures.

8. At the time SCE commenced construction in 1999, the project was exempt from GO 131-D's permitting requirement pursuant to Exemption g.

9. The mere fact that a project is located in the Coastal Zone does not constitute an unusual circumstance requiring CEQA review.

10. SCE did not violate GO 131-D by commencing construction of the project in 1999 without a permit to construct.

11. SCE should be granted a permit to construct for the Santa Barbara County Reliability Project, constructed as the Proposed Project, with mitigation set forth in the Mitigation Monitoring Plan, which is attached to this order, except that SCE should not be subject to MM BIO-14 or MM GEO-1.

12. The proceeding should be closed.

ORDER

IT IS ORDERED that:

1. Southern California Edison Company is granted a permit to construct the Santa Barbara County Reliability Project, constructed as the Proposed Project, with mitigation set forth in the Mitigation Monitoring Plan, which is attached to this decision, except that Southern California Edison Company is not subject to Mitigation Measure BIO-14 or Mitigation Measure GEO-1.

2. Energy Division may approve requests by Southern California Edison Company for minor project refinements which meet the fixed criteria described below and that may be necessary to complete the Santa Barbara County Reliability Project due to final engineering or other reasons. Minor project refinements cannot create a new significant impact or a substantial increase in the severity of a previously identified significant impact, based on the thresholds used in the Environmental Impact Report. They cannot require new conditions for approval, without which the refinements would result in a new significant impact or a substantial increase in the severity of a previously identified significant impact. They cannot conflict with any mitigation measure or applicable law or policy or trigger an additional permit requirement. Specifically, they must not change mitigation measures. Minor project refinements must be located within the geographic boundary of the study area of the Environmental Impact Report. Southern California Edison Company shall seek any other project refinements by a petition to modify this decision.

3. Application 12-10-018 is closed.

This order is effective today.

Dated _____, at San Francisco, California.

ATTACHMENT

Santa Barbara County Reliability Project Mitigation Monitoring Plan

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10.0 Mitigation Monitoring Plan

The purpose of this Mitigation Monitoring and Reporting Plan (MMP) is to ensure effective implementation of the applicant proposed measures (APMs) and mitigation measures required by the CPUC that the applicant has agreed to implement as part of the proposed project. The MMP, which is outlined in Table 10-1, includes:

- Each potentially significant impact identified in the Environmental Impact Report (EIR);
- APMs and mitigation measures that the applicant and SCE are required to implement as part of the proposed project;
- Monitoring requirements; and
- Timing for implementation of the APMs and mitigation measures.

A CPUC-designated environmental monitor (or monitors) will monitor construction of the proposed project to ensure full implementation of each APM and mitigation measure. In all instances where non-compliance occurs, the CPUC's designated environmental monitor will issue a warning to the construction supervisor and the applicant's project manager. Continued non-compliance will be reported to the CPUC's designated project manager. Any decisions to halt work due to non-compliance will be made by the CPUC. The CPUC-designated environmental monitor will keep a record of any incidents of non-compliance with mitigation measures, APMs, or other conditions of project approval. Copies of these documents will be supplied to the applicant and the CPUC.

This MMP is a draft program, and would be finalized if the CPUC approves the project. At that time final mitigation measures would be incorporated into the program and the roles and responsibilities for their implementation refined.

10.1 Minor Project Refinements

This section describes the CPUC's process for staff approval of minor project refinements (refinements) that may be necessary due to changes resulting after the applicant's final engineering of project elements. Approval of minor project refinements would only be granted by the CPUC if the refinements achieve or exceed the level of environmental protection approved in the project CEQA document, are consistent with CEQA requirements, and comply with the intent of the mitigation measures in the CEQA document. Requests for project modifications that do not fall within the authority delegated to staff must be sought by a Petition for Modification.

10.1.1 Minor Project Refinements Request Process

Requests for CPUC staff approval of a refinement must be made in writing and should include the following:

- A detailed description of the proposed refinement or refinements, including an explanation of why the refinements are necessary;

- Identification of the mitigation measures, APMs, project parameter, or other project stipulation for which the refinements are being requested, and a reference to the approved documents;
- Photos, maps, and other supporting documentation illustrating the difference between the existing conditions in the project area, the approved project, and the proposed refinements;
- The potential impacts of the proposed refinements, including a discussion of each environmental issue area that could be affected by the refinements with accompanying verification that there would be no increase in significant impacts on resources affected by the project and no new significant impacts, after application of previously adopted mitigation;
- Whether the refinements conflict with any APMs or mitigation measures;
- Whether the refinements conflict with any applicable guideline, ordinance, code, rule, regulation, order, decision, statute, or policy;
- Water/wetland/stormwater-related resource information if the refinements would result in any additional land disturbance, road distance, or width changes to jurisdictional delineation of waters, or changes to water protection best management practices; and
- The date of expected construction at the refinements site area.

The CPUC project manager may request additional information or a site visit in order to process the request.

10.1.2 Requirements for Staff Approval of Minor Refinements

To be approved by staff, refinements must meet all of the following fixed standards. Refinements must not:

- Be outside the geographic boundary of the study area utilized in the CEQA document;
- Create a new significant impact or a substantial increase in the severity of a previously identified significant impact, based on the thresholds used in the environmental document;
- Trigger additional permit requirements;¹
- Conflict with any APMs or mitigation measures or any applicable guideline, ordinance, code, rule, regulation, order, decision, statute, or policy; or
- Require new conditions for approval, without which the refinements would result in a new significant impact or a substantial increase in the severity of a previously identified significant impact.

Examples of refinements that may be approved by staff after final engineering include, but are not limited to:

¹ For example: grading, disposal, water discharge, dredging, a Clean Water Act Section 404 permit or a California Fish and Game Code Section 1602 Lake or Streambed Alteration Agreement.

- Adding a temporary extra work area (no more than 60 days of use) or substituting a work area, including lay-down and staging, for another work area that is as suitable as or more suitable than the originally proposed work area. The temporary extra work area or substitute work area must be located in a disturbed area with no sensitive resources or sensitive land uses adjacent to the proposed area, must not create any permanent impacts, and must be restored to either its initial condition² or an improved condition.³
- Adjusting the alignment of a project within the study area that was utilized in the original environmental analysis to avoid unanticipated impacts related to cultural artifacts, buried utility infrastructure, hazardous and toxic substances, and other land use impacts including effects on homeowners, so long as the adjustment does not create a new significant impact or a substantial increase in the severity of a previously identified significant impact.
- Adjusting the alignment of a project within the study area that was utilized in the original environmental analysis to avoid or adapt to conditions on the ground that vary from the conditions that existed at the time of the original environmental analysis, so long as the adjustment does not create a new significant impact or a substantial increase in the severity of a previously identified significant impact.

10.2 Dispute Resolution

The following procedure will be observed for dispute resolution:

- Step 1. Disputes and complaints (including those of the public) should be directed first to the CPUC-designated Project Manager for resolution. The Project Manager will attempt to resolve the dispute.
- Step 2. Should this informal process fail, the CPUC Project Manager may initiate enforcement or compliance action to address deviations from the proposed project or adopted MMP.
- Step 3. If a dispute or complaint regarding the implementation or evaluation of the MMP cannot be resolved informally or through enforcement or compliance action by the CPUC, any affected participant in the dispute or complaint may file a written “notice of dispute” with the CPUC Executive Director. This notice should be filed in order to resolve the dispute in a timely manner, with copies concurrently served on other affected participants. Within 10 days or receipt, the Executive Director or designee(s) shall meet or confer with the filer and other affected participants for the purposes of resolving the dispute. The Executive Director shall issue an Executive Resolution describing his/her decision, and serve it on the filer and other affected participants.

² The initial condition of the area is the condition prior to its use as a work area.

³ For example, trash has been cleaned up that was originally on the site or the site is replanted with native vegetation.

- 1 • Step 4. If one or more of the affected parties is not satisfied with the decision as described in
2 the resolution, such party(ies) may appeal it to the CPUC via a procedure to be specified by
3 the commission.
4

5 Parties may also seek review by the CPUC through existing procedures specified in the CPUC Rules
6 of Practice and Procedure for formal and expedited dispute resolution, although a good faith effort
7 should first be made to use the foregoing procedure.
8

9 10.3 Mitigation, Monitoring, Reporting, and Compliance Program

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11 A Final Mitigation, Monitoring, Reporting and Compliance Program will be prepared for the Final
12 EIR that incorporates any changes to the proposed project or mitigation measures that are made as
13 a result of public review of the Draft EIR and further consideration of the proposed project by the
14 CPUC.

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Table 10-1 Draft Mitigation Monitoring Plan

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
4.1 Aesthetics			
<i>Impact AE-2: Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.</i>	<p>MM AE-2: Construction Site Upkeep. The applicant will keep all construction sites clean and orderly and will ensure that building materials and equipment are as inconspicuous as possible (e.g., screened or stored away from public view).</p> <p>MM AE-3: Reduce Aesthetic Impacts of Retaining Walls and Access Road Improvements. . For all retaining walls, other mechanically stabilized embankments (MSEs), and access road improvements (e.g., cut and fill slopes) visible from residences, public use or recreation areas, or publicly accessible state and county roads, aesthetic impacts will be reduced through application of techniques that minimize contrast with colors, forms, and textures within the surrounding landscape setting. Visible portions of concrete crib walls, other MSEs, and cut and fill slopes with exposed soil and/or rock will use finish colors and/or surface applications that help substantially blend these structures with their surroundings. Surface applications to reduce contrast may include non-toxic, long-lasting darkening agents; other non-toxic color contrast reduction agents; rock applications; and/or naturalistic surface patterning. Native vegetation will be planted in locations in close proximity to concrete crib walls, other MSEs, and cut and fill slope that will help screen these elements from public views and blend them with their surroundings.</p>	<p>Verify cleanliness of construction sites.</p> <p>Verify minimization of contrast.</p>	<p>During construction.</p> <p>During post-construction.</p>

Table 10-1 Draft Mitigation Monitoring Plan

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>MM AE-4: Glare and Color Contrast Reduction for Transmission Structures and Conductors. To reduce potential glare and color contrast for components of the proposed project, the finish on all new transmission structures will be non-reflective, such as steel that has been galvanized and treated to create a dulled finish, to reduce light reflection and color contrast and help blend the structures into the landscape setting. All new transmission conductors will be non-specular to minimize conductor reflectivity and help blend them into the landscape setting. J-Tower structures will have a non-reflective, dull-galvanized steel, self-weathering steel or steel that has been treated with a long-lasting coating that is medium to dark brown or medium to dark green in color and has a dulled finish to reduce light reflection and help blend the selected structures into the landscape setting.</p> <p>At least 90 days prior to the planned erection of transmission structures, SCE shall submit to the CPUC a Surface Treatment Plan containing a description of the galvanizing specifications, and samples showing the range of dulling for the structures. The CPUC shall approve the Surface Treatment Plan, or otherwise inform SCE what modifications to the Surface Treatment Plan are necessary, within 30 days after the Plan's submittal by SCE. SCE shall not implement the Surface Treatment Plan until the plan has been approved by the CPUC. Prior to the completion of construction, SCE shall provide the CPUC with documentation that the structures have been galvanized and dulled in accordance with the specifications detailed in the approved Surface Treatment Plan.</p>	Verify non-reflective materials have been used.	During construction.

Table 10-1 Draft Mitigation Monitoring Plan

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	MM BIO-5: Habitat Restoration and Mitigation. See below.		
<i>Impact AE-3: Substantially degrade the existing visual character or quality of the site and its surroundings</i>	<p>MM AE-1: Minimize Permanent Disturbance Aesthetic Impacts. The applicant shall implement methods to restore permanent disturbed areas to conditions that would blend with the overall landscape character to the extent feasible.</p> <p>MM AE-2: Construction Site Upkeep. See above.</p> <p>MM AE-3: Reduce Aesthetic Impacts of Retaining Walls and Access Road Improvements. See above.</p> <p>MM AE-4: Glare and Color Contrast Reduction for Transmission Structures and Conductors. See above.</p> <p>MM BIO-5: Habitat Restoration and Mitigation. See below.</p>	Verify landscape character conditions of permanent disturbance areas.	During post-construction.
<i>Impact AE-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area</i>	MM AE-4: Glare and Color Contrast Reduction for Transmission Structures and Conductors. See above.		
4.2 Agriculture			
No applicable APMs or mitigation measures.			
4.3 Air Quality			
<i>Impact AQ-2: Violate any air quality standard or contribute substantially to an existing or projected air quality violation.</i>	<p>APM AQ-1: The following control measures stated in the VCAPCD Ventura County Air Quality Assessment Guidelines to minimize the generation of fugitive dust (PM10 and PM2.5) would be implemented during construction of the proposed project, as feasible:</p> <ul style="list-style-type: none"> The area disturbed by clearing, grading, earth-moving, or excavation operations shall be minimized to prevent excessive amounts of dust. 	Verify implementation of measures.	During construction and restoration.

Table 10-1 Draft Mitigation Monitoring Plan

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<ul style="list-style-type: none"> Pre-grading/excavation activities shall include watering the area to be graded or excavated before commencement of grading or excavation operations. Application of water (preferably reclaimed, if available) should penetrate sufficiently to minimize fugitive dust during grading activities. Fugitive dust produced during grading, excavation, and construction activities shall be controlled by the following activities: <ol style="list-style-type: none"> All trucks shall be required to cover their loads as required by California Vehicle Code §23114. All graded and excavated material, exposed soil areas, and active portions of the construction site, including unpaved on-site roadways, shall be treated to prevent fugitive dust. Treatment shall include, but not necessarily be limited to, periodic watering, application of environmentally safe soil stabilization materials, and/or roll-compaction as appropriate. Watering shall be done as often as necessary, and reclaimed water shall be used whenever possible. Graded and/or excavated inactive areas of the construction site shall be monitored by the applicant at least weekly for dust stabilization. Soil stabilization methods, such as water and roll-compaction, and environmentally safe dust control materials, shall be periodically applied to portions of the construction site that are inactive for more than four days. If no further grading or excavation operations are planned for the area, the area should 		

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>be seeded and watered until grass growth is evident, or periodically treated with environmentally safe dust suppressants, to prevent excessive fugitive dust.</p> <ul style="list-style-type: none"> • Signs shall be posted on site limiting traffic to 15 miles per hour or less. • During periods of high winds (i.e., wind speed sufficient to cause fugitive dust to impact adjacent properties), all clearing, grading, earth-moving, and excavation operations shall be curtailed to the degree necessary to prevent fugitive dust created by on-site activities and operations from being a nuisance or hazard, either off site or on site. The site superintendent/supervisor shall use his/her discretion in conjunction with the APCD to determine when winds are excessive. • Adjacent streets and roads shall be swept at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads. • Personnel involved in grading operations, including contractors and subcontractors, should be advised to wear respiratory protection in accordance with California Division of Occupational Safety and Health regulations. <p>APM AQ-2: The following control measures stated in the VCAPCD Ventura County Air Quality Assessment Guidelines would be implemented during construction of the Project as feasible:</p> <ul style="list-style-type: none"> • Minimize equipment idling time. 	Verify implementation of measures.	During construction and restoration.

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<ul style="list-style-type: none"> Maintain equipment engines in good condition and in proper tune as per manufacturers' specifications. Lengthen the construction period during smog season (May through October), to minimize the number of vehicles and equipment operating at the same time. Use alternatively fueled construction equipment, such as compressed natural gas, liquefied natural gas, or electric, if feasible. 		
	MM AQ-1: Tier 3 and 4 Off-Road Emissions Standards. Off-road diesel-powered construction equipment greater than 75 horsepower used during 66-kV subtransmission line or access road construction will meet Tier 3 and Tier 4 off-road emissions standards to the greatest extent feasible during any calendar year in which ROG and NO _x construction emissions are anticipated to exceed SCAQMD Air Quality Significance Thresholds for Construction. During these years, the applicant will provide the CPUC with annual reports detailing the percentage of off-road diesel-powered construction equipment greater than 75 horsepower used for the proposed project that meet the Tier 3 or Tier 4 classification. The report will also include justification—supported by letters from local rental equipment retailers, documentation from contractors, or other evidence—for any deficiencies in Tier 3 and Tier 4 engine usage where construction activities continue to exceed SCAQMD thresholds.	Verify use of Tier 3 and Tier 4 vehicles	During construction and restoration.
<i>Impact AQ-3: Result in a cumulatively considerable net increase of any criteria pollutant for which the project</i>	APM AQ-1: See above. APM AQ-2: See above. MM AQ-1: Tier 3 and 4 Off-Road Emissions Standards.		

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
<i>region is in non-attainment under an applicable federal or state ambient air quality standard.</i>	See above.		
<i>Impact AQ-4: Expose sensitive receptors to substantial pollutant concentrations.</i>	APM AQ-1: See above. APM AQ-2: See above.		
4.4 Biological Resources			
<i>Impact BR-1: Substantial adverse direct or indirect effect on special status species.</i>	<p>APM BIO-1: Pre-construction biological surveys for special status plants and wildlife would be conducted 0 to 30 days before the start of construction by a qualified biologist in all laydown/work areas. If a special status species is encountered, biologists will record the location, take a photograph, and delineate a buffer area, as appropriate, where activities should be restricted for the protection of the resource. If impacts on the special status plant(s) or wildlife cannot be avoided, SCE will consult with the appropriate resource agency or agencies.</p> <p>APM BIO-2: To the extent feasible, SCE would minimize impacts and permanent loss to native vegetation types, vegetation that may support special status species, and known populations of special status plants at construction sites by avoiding construction activities in areas flagged to be avoided. If it is not possible to avoid impacts on native vegetation, a project revegetation plan may be prepared in consultation with the appropriate agencies for areas of native habitat temporarily impacted during construction.</p> <p>APM BIO-3: Biological monitors would monitor construction activities in wildlife habitat areas that may contain special status species, critical habitat for those species, or unique resources to ensure that such species,</p>	<p>Verify completion of surveys and avoidance or minimization of impacts to special status species.</p> <p>Verify placement of flagging and avoidance or minimization of impacts to special status plant species.</p> <p>Verify monitoring of ground-disturbing activities in biologically sensitive areas.</p>	<p>During pre-construction, construction, and restoration.</p> <p>During construction and restoration.</p> <p>During construction and restoration.</p>

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	habitat, or resources are avoided.		
	<p>APM BIO-4: SCE would conduct project-wide nesting bird surveys. SCE would, if feasible, remove trees, vegetation, subtransmission structures, and poles outside of the nesting season. If a tree, subtransmission structure, or pole containing a raptor nest must be removed during nesting season, SCE biologists would consult with the appropriate resource agencies. If work is scheduled to take place in close proximity to an active nest, appropriate nesting buffers or other measures would be established based on consultation with the appropriate resource agencies, or an adaptive management plan would be prepared to address nesting birds, subject to the approval of the CDFW. This project-specific Nesting Bird Management Plan would allow for implementation of species-specific buffer modification guidelines provided by a qualified utility avian biologist; nest buffers would be determined by species' sensitivity to disturbance, the nature of the construction activity, and the environmental conditions surrounding the nest.</p> <p>APM BIO-5: During the pre-construction surveys, a qualified biologist would identify any potential San Diego desert woodrat (<i>Neotoma lepida intermedia</i>) middens within 50 feet of project activities. At the discretion of a qualified biologist, an exclusion buffer would be established around any woodrat middens that can be avoided, and these exclusion zones would be flagged or fenced to protect the nest during the breeding season (October through June). If a woodrat midden cannot be avoided by the proposed project's activities, an appropriate resource agency would be consulted regarding a potential buffer reduction.</p>	<p>Verify completion of surveys. Review adequacy of plan and implementation of plan.</p> <p>Verify the completion of surveys and the avoidance or minimization of impacts on San Diego desert woodrat.</p>	<p>During construction and restoration.</p> <p>During pre-construction.</p>

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>APM BIO-6: A pre-construction, focused burrowing owl protocol survey shall be conducted no more than 30 days prior to commencement of ground-disturbing activities within suitable habitat to determine if any occupied burrows are present. If occupied burrows are found, adequate buffers shall be established around burrows based on a project-specific nesting bird management plan or consultation with the appropriate agencies. If occupied burrows cannot be avoided, an appropriate relocation strategy would be developed in conjunction with the CDFW and may include collapsing burrows outside of nesting season and using exclusionary devices to reduce impacts on the burrowing owl. Biological monitors would monitor all construction activities that have the potential to impact active burrows.</p> <p>APM BIO-7: The National Pollutant Discharge Elimination System Construction General Permit would require SCE to develop and implement a Stormwater Pollution Prevention Plan (SWPPP), which specifies best management practices (BMPs) to avoid or minimize impacts to water quality and riparian habitat during construction. See Appendix B for example BMPs provided by SCE.</p> <p>APM GEN-1: See below.</p> <p>APM AQ-1: See above.</p>	<p>Verify the completion of surveys and the avoidance or minimization of impacts on burrowing owl.</p> <p>Verify development and implementation of SWPPP BMPs.</p>	<p>During pre-construction.</p> <p>During construction and restoration.</p>

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>MM BIO-1: Limits of Construction Activities: Project Boundaries and Sensitive Areas Clearly Marked. In all locations of the project, construction activities, vehicular traffic (including movement of all equipment), and storage of construction materials will be restricted to approved access roads and established construction areas indicated by flagging, fencing, and/or signage. The applicant will ensure that exclusionary fencing is installed prior to the start of construction activities around laydown/work and staging areas, where necessary, to prevent inadvertent encroachment into the native habitat adjacent to areas of impact. Identified sensitive resources such as hydrologic features, special status plants and natural communities, and known wildlife habitat of special status species (e.g., nests, burrows, dens, middens) will be assigned a buffer as appropriate and clearly marked (e.g., with signs, flagging, ropes, and/or fencing) and avoided unless previously approved. A CPUC-approved qualified biologist will propose a buffer distance if sensitive resources are identified, and the applicant will consult with the CPUC and resource agency (ies) to determine whether the proposed buffer distance is appropriate. The CPUC-approved qualified biologist will perform or supervise flagging and fencing to ensure that these activities are conducted without harm to sensitive species or habitat.</p> <p>MM BIO-2: Preconstruction Survey Timing and Location Stipulations. Pre-construction surveys for special status plant and wildlife species will be conducted in all access, laydown/work, and staging areas where suitable habitat is present, including all tower installation sites, existing and proposed access roads, staging areas, and tower footing removal sites. Pre-construction surveys will not</p>	<p>Verify demarcation and avoidance of project boundaries and sensitive areas.</p> <p>Verify completion of pre-construction surveys and daily clearance sweeps.</p>	<p>During pre-construction , construction, and restoration.</p> <p>During pre-construction, construction, and restoration.</p>

Table 10-1 Draft Mitigation Monitoring Plan

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>include searches for special status fish. Rather, fish presence will be assumed at the locations described in this analysis, and CPUC-approved biological monitors will record any loss, injury, or other interactions with special status fish (as required in APM BIO-3).</p> <p>Additionally, a CPUC-approved qualified biologist will conduct pre-construction clearance sweeps for special status species at all access, staging, and laydown/work areas where suitable habitat is present within approximately 24 hours of construction activities each day.</p> <p>If a special status species is found at any time, the applicant will contact the appropriate wildlife agency(ies), in addition to the CPUC, within 48 hours.</p> <p>MM BIO-3: Noxious and Invasive Weed Control Plan. Prior to construction, the applicant will submit a Noxious and Invasive Weed Control Plan that is to be implemented before, during, and after construction and restoration of the proposed project. The final Noxious and Invasive Weed Control Plan shall be implemented, as specified, throughout construction and restoration. This plan will include measures designed to avoid the introduction and spread of noxious weeds and invasive plant species designated by the state, the counties, or local weed control boards. At a minimum, this plan will include the following measures:</p> <ul style="list-style-type: none"> Pre-construction surveys for special status plant species (APM BIO-1 and MM BIO-2) will include surveys for state- and county-designated noxious 	Review adequacy of plan and verify implementation of plan.	During pre-construction, construction, and restoration.

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>weed species. The applicant will coordinate with the appropriate agencies, including the CPUC, to determine appropriate species-specific measures to implement, or whether control or treatment of a species is feasible.</p> <ul style="list-style-type: none"> • If an invasive weed species is present at a given site, soils excavated from this location for use in construction and restoration activities (e.g., backfilling, road rehabilitation, etc.) will not be transported to a location that does not already contain the said invasive species. • All vehicles and equipment will be cleaned off site prior to initial arrival at the project. • Crews, with construction inspector oversight, will ensure that vehicles and equipment are free of soil and debris capable of transporting noxious weed seeds, roots, or rhizomes before the vehicles and equipment are allowed use of access roads. • Vehicle and equipment wash stations (mobile or built in place) will be erected at strategic locations on the right-of-way where designated weed species have been detected, and where doing so would help prevent the spread of these species. • Straw, hay, gravel, soil, or other construction materials that could inadvertently contain unwanted plant propagules will come from state-cleared sources that are free of invasive weeds. • All seeds to be used in revegetation and 		

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>reclamation activities will come from weed-free sources.</p> <ul style="list-style-type: none"> All temporary disturbance areas not subject to existing infestations of invasive plants, including access roads, transmission line corridors, and towers, will be monitored for invasive species establishment on a quarterly basis for at least one year after project construction and restoration is completed. If evidence of invasive species introduction is found, the applicant will coordinate with appropriate agencies, including the CPUC, to determine appropriate species-specific measures to implement. This plan will be developed in consultation with resource agencies (CDFW, Santa Barbara and Ventura Counties, CPUC, as appropriate) and will be provided to these agencies for review and comment. The plan must be finalized and approved by the CPUC prior to the start of construction. Santa Barbara County must approve plan language that relates to areas within its jurisdiction prior to project activities within the Santa Barbara Coastal Development Zone. 		
	<p>MM BIO-4: Limit Removal of Native Plants, Trees, and Natural Communities.</p> <ul style="list-style-type: none"> Temporary construction areas will be impacted in such a way that facilitates post-construction restoration. For 	Verify implementation of any avoidance, minimization, and mitigation measures.	During construction and restoration.

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>example, drive-and-crush methods in areas with native vegetation will be employed where possible.</p> <ul style="list-style-type: none"> The applicant will consult with a qualified arborist for the trimming and removal of all native vegetation. The applicant will work with the qualified arborist to determine the minimum amount of vegetation removal required to accommodate project construction and restoration, as well as the correct trimming procedures to employ. Additionally, the applicant will work with the qualified arborist to preserve root zone aeration and the stability of native trees where possible. The applicant will consult with the appropriate agency, including the CPUC, and will adhere to any regulations and permit conditions for the following impacts: <ul style="list-style-type: none"> Impacts on Critical Habitat. Impacts on ESHAs in the Coastal Zone. Impacts on special status natural communities, including riparian communities, southern California black walnut woodland, southern coast live oak riparian forest, and southern sycamore alder riparian woodland. 		

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<ul style="list-style-type: none"> Impacts on coast live oak trees in the Coastal Zone (specifically, consistency with Policy 9-35 and Policy 9-36 of the Santa Barbara County Coastal Land Use Plan is required). <p>MM BIO-5: Habitat Restoration and Mitigation.</p> <ul style="list-style-type: none"> The applicant will ensure that all areas that are temporarily impacted are restored as closely to pre-construction conditions as possible. Alternatively, areas that do not provide habitat to special status species or sensitive resources may be restored to the conditions agreed upon between the landowner and the applicant. Prior to construction, the applicant will submit a Habitat Restoration and Mitigation Plan to address areas of habitat loss to be restored or mitigated (for disturbances to jurisdictional features, see MM BIO-7). This plan will be developed in consultation with resource agencies (NMFS, USFWS, CDFW, Santa Barbara and Ventura Counties, CPUC, as appropriate) and will be provided to these agencies for review and comment. The plan must be finalized and approved by the CPUC prior to the start of construction. Santa Barbara County must approve plan language that relates to areas within their jurisdiction, prior to project activities within the Coastal Development Zone. 	Review adequacy of plan and verify implementation of plan.	During pre-construction, construction, and restoration.

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<ul style="list-style-type: none"> The plan will include details, including but not limited to, topsoil segregation and conservation; vegetation treatment and removal; revegetation methods, including seed mixes, rates, and transplants; criteria to monitor and evaluate revegetation success; and compensation and remedial measures to be implemented as needed. All disturbances to special status plants, county-protected trees, and special status natural communities will be restored or mitigated, and the plan will specify how each type will be addressed in terms of the above restoration details and/or other mitigation. For special status plant species, such as Santa Barbara honeysuckle or Nuttall's scrub oak, or special status natural communities in which mitigation requirements may not be specified through permits, restoration will occur after construction at a level of 1:1. This will be completed through one of the following methods: <ul style="list-style-type: none"> - Establishing the species/natural community habitat within the proposed project areas (onsite); - Establishing the species/natural community habitat outside the proposed project areas (offsite); or - Purchasing credits and/or mitigation lands at an entity approved by CDFW. <p>For Options 1 and 2 (onsite and offsite), post-construction monitoring will be performed for one to five years, depending on the disturbance</p>		

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>level and restoration level, and the success criteria will be specified in the plan.</p> <p>MM BIO-6: Wildlife Protection. To prevent entrapment of wildlife, all steep-walled trenches, auger holes, or other excavations will be covered at the end of each day. Fencing will be maintained around the covered excavations at night. For any open excavations, earthen escape ramps will be maintained. A CPUC-approved biological monitor will inspect all trenches, auger holes, or other excavations a minimum of twice per day during non-summer months and a minimum of three times per day during the summer (hotter) months, and also immediately prior to back-filling. Any wildlife species found will be safely removed and relocated out of harm's by a CPUC-approved biological monitor, using suitable tools such as a pool net when applicable.</p> <p>Measures will be taken to prevent impacts from project-related trash. All trash, including decomposable food scraps, will be stored in sturdy, animal-proof containers, and emptied regularly. All project construction vehicles will be equipped with trash bags.</p> <p>MM BIO-7: Night Lighting. Night lighting for construction and restoration use, such as to illuminate staging areas, may be used from dusk to dawn. All lighting will be shielded and directed downward to minimize the potential for glare or spillover onto adjacent properties and to reduce impacts on local wildlife. The applicant will indicate anticipated measures to resource agencies and the CPUC for approval prior to construction. The approved measures will be provided to the CPUC.</p> <p>MM BIO-8: Impact Reduction on Hydrologic Features and Aquatic Habitat. Prior to project construction for all</p>	<p>Verify excavations are covered at the end of each work day and monitored regularly. Verify construction trash is properly contained and regularly removed from construction sites.</p> <p>Verify proper shielding of lighting.</p> <p>Verify demarcation and avoidance of</p>	<p>During construction and restoration.</p> <p>During construction and restoration.</p> <p>During pre-construction, construction, and</p>

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>proposed project components in the vicinity of hydrologic features, the applicant will:</p> <ul style="list-style-type: none"> Ensure that CPUC-approved biological monitors will establish and maintain a minimum exclusionary buffer of 50 feet from the delineated extent of all jurisdictional features during construction and restoration. If the applicant cannot maintain the 50 foot exclusionary buffer from the delineated bed/bank of a drainage feature or associated riparian habitat during project construction and restoration, the applicant will consult with appropriate agencies about the need for any necessary permits (e.g., USFWS, NMFS, CDFW, USACE, CPUC, County, as appropriate); will provide standard SWPPP BMP measures to prevent any solid or liquid materials from entering the drainage; and will submit proposed measures to CPUC for approval prior to construction. Measures should include information on crossing streams on road beds. Vehicle or equipment travel and construction or restoration of any proposed project component that requires altering, removing, or filling the bed or bank of seasonal drainages or other jurisdictional or potentially jurisdictional water features will be performed only when water is not present in the feature, unless otherwise permitted by agencies (e.g., USFWS, NMFS, CDFW, USACE, CPUC, and County, as appropriate). Prior to construction, the applicant will submit a Hydrologic Features Mitigation Monitoring Plan 	<p>jurisdictional water. Verify implementation of SWPPP BMPs. Review adequacy of plan and verify implementation of plan.</p>	<p>restoration.</p>

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>for affected hydrologic features in consultation with resource agencies (USFWS, NMFS, CDFW, USACE, Santa Barbara County, CPUC, as appropriate) and will provide to these agencies for review and comment. The plan must be finalized and approved by the CPUC prior to the start of construction. Santa Barbara County must approve plan language that relates to areas within their jurisdiction, prior to project activities within the Coastal Development Zone.</p> <ul style="list-style-type: none"> The plan will provide measures to accomplish restoration, criteria for restoration success, a post-construction monitoring schedule, and compensation ratios for impacted jurisdictional areas. 		
	<p>MM BIO-9: California Red-Legged Frog Impact Reduction Measures. To reduce impacts on California red-legged frog, the following measures will be implemented:</p> <ul style="list-style-type: none"> A CPUC-approved qualified biologist will conduct habitat assessment surveys in accordance with the most recent USFWS protocol (e.g., USFWS Revised Guidance on Site Assessments and Field Surveys for the California Red-legged Frog, August 2005) for California red-legged frog at all jurisdictional drainage features that would be impacted in project area prior to construction (Table 4.4-4). 	<p>Verify the completion of surveys and the avoidance or minimization of impacts on California red-legged frog.</p>	<p>During pre-construction.</p>

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<ul style="list-style-type: none"> In areas where suitable habitat is determined to be present, pre-construction surveys in accordance with the most recent USFWS protocol (e.g., USFWS Revised Guidance on Site Assessments and Field Surveys for the California Red-legged Frog August 2005) for the California red-legged frog will be conducted to determine presence in the vicinity of the project area. If this species is identified in the project area at any time, the USFWS, CDFW, and CPUC will be notified within 48 hours and the applicant will consult with these agencies to determine the appropriate next steps. In suitable habitat for California red-legged frog, the applicant may perform protocol level, pre-construction surveys to confirm the absence of the species. If such surveys are not conducted, or if the surveys do not confirm absence, the applicant and/or its contractors will minimize impacts on California red-legged frog by avoiding suitable habitat whenever possible. Additional measures to avoid and minimize impacts to California red-legged frog and their habitat will be implemented as required by USFWS, but will include the following at a minimum: <ul style="list-style-type: none"> A USFWS-approved biologist will survey the work site no more than two weeks before the onset of construction activities. If California red-legged frogs are found, relocations will be conducted only in consultation with the USFWS. If the 		

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>USFWS approves moving animals, the approved biologists will be allowed sufficient time to move California red-legged frog from the work site before work activities begin. Only USFWS-approved biologists will participate in activities associated with the capture, handling, and monitoring of California red-legged frog. Evidence of the USFWS's approval of red-legged frog biologists will be submitted to the CPUC.</p> <ul style="list-style-type: none"> ○ Before any construction activities begin on a project, a USFWS-approved biologist will conduct a training session for all construction personnel. At a minimum, the training will include a description of the California red-legged frog and its habitat and the general measures that are being implemented to conserve the California red-legged frog as they relate to the project. ○ A USFWS-approved biologist will be present at the work site until such time as all removal of California red-legged frogs, instruction of workers, and habitat disturbance have been completed. After this time, the applicant may designate a CPUC-approved qualified biological monitor to monitor on-site compliance with all minimization measures. ○ The qualified CPUC-approved biological monitor and the USFWS-approved biologist will have the authority to halt any action that may result in impacts to 		

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>California red-legged frog.</p> <ul style="list-style-type: none"> During project activities, all trash that may attract predators will be properly contained, removed from the work site, and disposed of regularly. Following construction, all trash and construction debris will be removed from work areas. All fueling and maintenance of vehicles and other equipment and staging areas will occur at least 100 feet from any riparian and aquatic habitat. All workers will be informed of the importance of preventing spills and the appropriate measures to take should a spill occur. <p>MM BIO-10: Nesting Bird Management Plan. Prior to construction, the applicant will submit a project-specific Nesting Bird Management Plan in consultation with the USFWS, CDFW, and CPUC, which provides measures and an adaptive management program designed to avoid or reduce impacts on special-status and MBTA-protected bird species during nesting periods. The final Nesting Bird Management Plan shall be implemented, as specified, throughout construction and restoration. This plan will include the following information:</p> <ul style="list-style-type: none"> Appropriate survey timing, extents, and methods; approved nest deterrent methods, including areas where vegetation will be cleared for the purpose of deterring nesting; inactive nest management; monitoring and reporting protocols during construction; protocol for determining whether a nest is active; protocol 	<p>Review adequacy of plan and verify implementation of plan.</p>	<p>During pre-construction, construction, and restoration.</p>

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>for documenting, reporting, and protecting active nests within construction and restoration areas. If pre-construction survey protocols exist for a certain species, the plan will outline the implementation of these protocols.</p> <ul style="list-style-type: none"> • Appropriate and effective buffer distances, including horizontal buffers from nests, horizontal buffers from territories if appropriate, and vertical buffers for helicopters. Buffers will not be based on generalized assumptions regarding all nesting birds, but will be site- and species/guild-specific and account for specific stage of nesting cycle and construction work type. • During construction and restoration, a CPUC-approved avian biologist will implement the appropriate buffer distance in accordance with the Nesting Bird Management Plan. • A process for reducing nesting bird buffer distances. Buffer reductions for special-status species and raptors must receive concurrence by appropriate wildlife agencies and the CPUC. Buffer reductions for common species will be determined by the CPUC-approved biologist, and the applicant will notify the CPUC prior to implementation. • The minimum requirements to become a CPUC-approved avian biologist and biological monitor for nesting birds, including the minimum required education, experience in conducting biological surveys, and experience with specific birds in the project area. • The CPUC-approved biological monitor will halt 		

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>work if it is determined that active nesting would be disturbed by construction or restoration activities until further direction or approval to work is obtained from the CPUC and/or appropriate wildlife agencies.</p> <p>This plan will be submitted to the wildlife agencies and the CPUC for review and comment, and the plan will be finalized and approved by the CPUC prior to the start of construction.</p> <p>MM BIO-11: Burrowing Owl Impact Reduction Measures. To further reduce impacts on burrowing owls, the following measures will be implemented:</p> <ul style="list-style-type: none"> • A CPUC-approved qualified biologist familiar with burrowing owl biology and survey methods will conduct pre-construction surveys for this species. • Surveys for burrowing owls will be conducted no more than 30 days prior to construction activities during the non-breeding season and no more than 14 days prior to construction in the breeding season, to confirm whether burrowing owls occupy the site, and if so, whether the owls are actively nesting. Surveys will be done throughout the project areas of potential effect, plus an additional area extending 300 feet from the proposed project's boundaries. • If an occupied burrow is identified, the CPUC-approved qualified biologist will recommend an 	<p>Verify the completion of pre-construction surveys and the avoidance or minimization of impacts on burrowing owl. If necessary, review adequacy of plan and verify implementation of plan.</p>	<p>During pre-construction, construction, and restoration.</p>

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>appropriate buffer based on the circumstances (e.g., owl tolerance and construction activity level) and as explained by the <i>Staff Report on Burrowing Owl Mitigation</i> (CDFG 2012 or more recent). The buffer will be approved by the CPUC.</p> <ul style="list-style-type: none"> If preconstruction surveys identify a burrowing owl then the applicant will submit a Burrowing Owl Compensation Plan in consultation with appropriate wildlife agencies and the CPUC that is consistent with mitigation guidelines as outlined in the Staff Report on Burrowing Owl Mitigation (CDFG 2012 or more recent) prior to construction. The final Burrowing Owl Compensation Plan shall be implemented, as specified, throughout construction and restoration. The plan will describe the compensatory measures that will be undertaken to address the loss of burrowing owl burrows within the project area. This will include mitigation for permanent impacts on nesting, occupied and satellite burrows and occupied burrowing owl habitat with (a) permanent conservation of similar vegetation communities comparable to or better than that of the impact area, and (b) sufficiently large acreage, and presence of fossorial mammals. The CDFW and the CPUC will be notified of all project-related burrowing owl injuries or mortalities within 12 hours of discovery and will follow CDFW's recommended actions. <p>MM BIO-12: Southwestern Willow Flycatcher and Least</p>	Verify the completion of	During pre-construction,

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>Bell's Vireo Impacts Reduction Measures. To reduce impacts on southwestern willow flycatcher, the following measures will be implemented:</p> <ul style="list-style-type: none"> A CPUC-approved qualified biologist will conduct habitat assessment surveys for southwestern willow flycatcher and least Bell's vireo at all jurisdictional drainage features that would be impacted in project area (Table 4.4-4). In addition, habitat assessments should be conducted at any other drainage where construction activities (e.g., overhead stringing by helicopter) could impact this species, including the section of Ventura River that is spanned by the project. In areas where suitable habitat is determined to be present, pre-construction nesting season surveys following the most recent USFWS protocol for the southwestern willow flycatcher and least Bell's vireo will be conducted to determine presence in the vicinity of the project area. If either species is found to actively nest in the project area, the USFWS, CDFW, and CPUC will be notified within 48 hours of nesting or territory confirmation. In the event that a southwest willow flycatcher or least Bell's vireo individual or nest is observed, biologists will establish and maintain an exclusionary buffer as specified in the Nesting Bird Management Plan (MM BIO-10). <p>MM BIO-13: Ringtail and American Badger Impacts</p>	<p>pre-construction surveys and the avoidance or minimization of impacts on southwestern willow flycatcher and least Bell's vireo.</p> <p>Verify the completion of</p>	<p>construction, and restoration.</p> <p>During pre-construction,</p>

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>Reduction Measures. To reduce impacts on ringtail and American badger, the following measures will be implemented:</p> <ul style="list-style-type: none"> • If occupied ringtail dens or badger burrows are observed during pre-construction surveys or sweeps a CPUC-approved qualified biologist will recommend an appropriate buffer distance around the den or burrow to the CPUC. Once the distance is approved by the CPUC, the biologist will demarcate the disturbance buffer and construction activities will be restricted within the buffer. • CPUC-approved qualified biologists will be notified if ringtails or badgers are observed within the project area during construction activities. Work will immediately be stopped in the area if the CPUC-approved qualified biologists find an occupied den or burrow within 100 feet of construction activities. Work can resume once the den or burrow is confirmed to be unoccupied by a CPUC-approved qualified biologist or an appropriate buffer is approved by the CPUC and implemented. • If badger burrows cannot be avoided, a CPUC-approved qualified biologist will ensure passive relocation of the occupants by installing one-way trap doors on the burrow. The burrow will be collapsed after the badger vacates. • During the spring months when young may be 	pre-construction surveys and the avoidance or minimization of impacts on ringtail and American badger.	construction, and restoration.

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>present in burrows, burrows must be checked for young before installation of the one-way trap door. If young are present during relocation efforts, all work will stop within 100 feet of the burrow until the young have left the burrows within the project area.</p> <ul style="list-style-type: none"> • If ringtail dens cannot be avoided, the applicant will consult the appropriate agencies (CDFW, CPUC) to determine an appropriate course of action, including potential passive relocation or other measures. • Prior to any relocation efforts, the applicant will obtain specific approval from the appropriate agencies (CDFW, CPUC). 		
	<p>MM BIO-14: O&M Mitigation. For O&M activities that require ground disturbance or vegetation clearance, including tree trimming, in project areas that pose a risk to sensitive species or their habitat, as identified in Appendix D, "Biological Technical Report for the Santa Barbara County Reliability Project," SCE shall implement APMs and MMs consistent with those required during the construction phase for the same activities in these same work areas. Compliance with these APMs and MMs shall be in addition to state, federal, and local regulations and permit requirements that are not preempted by the CPUC. Appropriate measures will be determined based on the habitat and sensitive resources within each O&M work area and will be consistent with those required during the construction phase for these same work areas. The applicant will submit records on an annual basis to the CPUC Energy Division documenting locations where</p>	<p>Review the applicant's annual records and verify that appropriate APMs and MMs were implemented. Verify that appropriate records were submitted to Santa Barbara County.</p>	<p>Prior to and during operations and maintenance activities requiring ground disturbance or vegetation clearance, including tree trimming.</p>

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	ground disturbing and vegetation clearance activities were performed and a record of the APMs and MMs that were implemented. The applicant will also submit records on an annual basis to Santa Barbara County if such O&M activities occur in the Santa Barbara Coastal Zone during the reporting period.		
<i>Impact BR-2: Substantial adverse effect on riparian habitat or other sensitive natural community.</i>	APM BIO-1: See above. APM BIO-2: See above. APM BIO-3: See above. APM BIO-7: See above. APM AQ-1: See above. APM GEN-1: See below. MM BIO-1: Limits of Construction Activities: Project Boundaries and Sensitive Areas Clearly Marked. See above. MM BIO-3: Noxious and Invasive Weed Control Plan. See above. MM BIO-4: Limit Removal of Native Plants, Trees, and Natural Communities. See above. MM BIO-5: Habitat Restoration and Mitigation. See above. <u>MM BIO-14: O&M Mitigation. See above.</u>		
<i>Impact BR-3: Substantial adverse effect on federally protected wetlands.</i>	APM BIO-2: See above. APM BIO-3: See above. <u>APM BIO-7: See above.</u> APM AQ-1: See above. APM GEN-1: See below. MM BIO-1: Limits of Construction Activities: Project Boundaries and Sensitive Areas Clearly Marked. See		

Table 10-1 Draft Mitigation Monitoring Plan

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>above.</p> <p>MM BIO-3: Noxious and Invasive Weed Control Plan. See above.</p> <p>MM BIO-4: Limit Removal of Native Plants, Trees, and Natural Communities. See above.</p> <p>MM BIO-5: Habitat Restoration and Mitigation. See above.</p> <p>MM BIO-8: Impact Reduction on Hydrologic Features and Aquatic Habitat. See above.</p> <p><u>MM BIO-14: O&M Mitigation. See above.</u></p>		
<p><i>Impact BR-4: Substantial interference with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impedance of the use of native wildlife nursery sites.</i></p>	<p>APM BIO-3: See above.</p> <p>APM GEN-1: See below.</p> <p>MM BIO-1: Limits of Construction Activities: Project Boundaries and Sensitive Areas Clearly Marked. See above.</p> <p>MM BIO-2: Preconstruction Survey Timing and Location Stipulations. See above.</p> <p>MM BIO-3: Noxious and Invasive Weed Control Plan. See above.</p> <p>MM BIO-4: Limit Removal of Native Plants, Trees, and Natural Communities. See above.</p> <p>MM BIO-5: Habitat Restoration and Mitigation. See above.</p> <p>MM BIO-6: Wildlife Protection. See above.</p> <p>MM BIO-7: Night Lighting. See above.</p> <p>MM BIO-8: Impact Reduction on Hydrologic Features and Aquatic Habitat. See above.</p> <p>MM BIO-11: Avian Protection Plans. See above.</p> <p><u>MM BIO-10: Nesting Bird Management Plan. See above.</u></p> <p><u>MM BIO-14: O&M Mitigation. See above.</u></p>		

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
<i>Impact BR-5: Conflict with local policy and ordinance protecting oak trees.</i>	APM BIO-1: See above. APM BIO-2: See above. APM BIO-3: See above. APM GEN-1: See below. MM BIO-1: Limits of Construction Activities: Project Boundaries and Sensitive Areas Clearly Marked. See above. MM BIO-2: Preconstruction Survey Timing and Location Stipulations. See above. MM BIO-3: Noxious and Invasive Weed Control Plan. See above. MM BIO-4: Limit Removal of Native Plants, Trees, and Natural Communities. See above. MM BIO-5: Habitat Restoration and Mitigation. See above. <u>MM BIO-14: O&M Mitigation. See above.</u>		
4.5 Cultural Resources			
<i>Impact CR-1: Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5.</i>	APM CUL-1: Avoidance, Minimization, and Mitigation. Potential project-related effects on historical resources may be mitigated or reduced to a less than significant level by implementing SCE's cultural resources Unanticipated Discovery Plan and employing one or more standard practice mitigation scenarios including, but not limited to: <ul style="list-style-type: none"> Prehistoric Resources <ul style="list-style-type: none"> avoid where feasible (avoidance by design, preserve in place, capping) minimize (reduction of Area of Direct Impact/Effect) 	Review adequacy of plan and verify implementation of plan.	During pre-construction, construction, and restoration.

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<ul style="list-style-type: none"> – mitigate (historic context statement, data recovery) • Historic Resources <ul style="list-style-type: none"> – avoid where feasible (avoidance by design, preserve in place, capping) – minimize (reduction of Area of Direct Impact/Effect) – mitigate (historic context statement, data recovery) • Historic Architecture/Utility Infrastructure <ul style="list-style-type: none"> – avoid where feasible (avoidance by design, preserve in place) – minimize (reduction of Area of Direct Impact/Effect) – mitigate (historic context statement, Historic American Engineering Record, Historic American Building Survey, advanced California Department of Parks and Recreation recordation) <p>The applicant's Unanticipated Discovery Plan would describe the procedures to be followed in the event that previously unidentified cultural resources are discovered during construction of the proposed project. If previously unidentified cultural resources are discovered during construction, personnel would be instructed to suspend work in the vicinity of the find.</p> <p>The resource would then be evaluated for listing in the</p>		

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>CRHR by a qualified archaeologist, and, if the resource is determined to be eligible for listing in the CRHR, either the resource would be avoided or mitigated. If human skeletal remains are uncovered during construction of the proposed project, the applicant and/or its contractors shall immediately halt all work in the immediate area, contact the applicable County Coroner to evaluate the remains, and follow the procedures and protocols set forth in Section 15064.5 (e)(1) of the CEQA Guidelines.</p> <ul style="list-style-type: none"> Per Health and Safety Code 7050.5, upon the discovery of human remains, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains. If the applicable County Coroner determines that the remains are Native American, it is anticipated that the coroner would contact the Native American Heritage Commission in accordance with Health and Safety Code Section 7050.5(c) and Public Resources Code 5097.98 (as amended by Assembly Bill 2641). In addition, the applicant shall ensure that the immediate vicinity where the Native American human remains are located is not damaged or disturbed by further development activity until the applicant has discussed and conferred, as prescribed in Public Resources Code 5097.98, with the most likely descendants regarding their recommendations. <p>APM CUL-2: Paleontological Resources Management Plan (PRMP). SCE shall prepare and implement a PRMP that would include, but not be limited to: preconstruction coordination; recommended monitoring methods; emergency discovery procedures; sampling and data recovery methods, if needed; museum storage</p>	Verify adequacy of plan.	During pre-construction.

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>coordination for any specimens and data recovered; and reporting requirements. The PRMP would also provide for sediment screening, fossil preparation, curation, and preparation of a report detailing the results of the work. In addition, the PRMP would specify monitoring requirements such as the presence of a paleontological monitor when work is being performed at formations with high paleontological sensitivity. If very few or no fossil remains are found during ground-disturbing activities, monitoring time can be reduced or suspended entirely, per recommendations of the paleontological field supervisor.</p> <p>APM CUL-3: A cultural resources survey of those areas that could not be previously accessed would be conducted prior to the start of construction. These surveys would identify and/or address any potential sensitive cultural resources that may be impacted by the Project, including the substation sites, subtransmission line and telecommunication cable routes, wire stringing locations, access and spur roads, drilling and crane pads, and staging yards.</p> <p>MM CR-1: Additional Cultural Resources Surveys. Prior to issuance of construction permits, the applicant will ensure that qualified archaeological consultants, as specified in the Cultural Resources Plans, will conduct intensive-level cultural resources surveys (transects no greater than 15 meters) for all areas to be disturbed that have not already been surveyed for cultural resources and that, prior to the project, had been undisturbed. Reports that specify the research design, methods, and survey results will be submitted to the CPUC for review and must be accepted by the CPUC prior to the start of ground disturbance in the unsurveyed areas.</p>	<p>Verify completion of surveys.</p> <p>Verify completion of surveys.</p>	<p>During pre-construction.</p> <p>During pre-construction.</p>

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>MM CR-2: Avoid Known Cultural Resources. Prior to construction, on a complete set of final project construction plans, cultural resources sites will be denoted as Environmentally Sensitive Areas by a CPUC-approved cultural resources consultant (MM CR-3). If any project-related construction or restoration activity will occur within 50 feet of CA-VEN-58, CA-SBA-3587, GANDA-1, or any other known cultural resource site, the sites will be designated as Environmentally Sensitive Areas. This list is not intended to be exhaustive and may not include all sites denoted as Environmentally Sensitive Areas on the project plans. The project plans will become confidential and only be provided to approved cultural resources consultants, Native American monitors approved by a tribe (MM CR-5) for monitoring during project construction (if applicable), and the applicant's Environmental Coordinators and construction supervisors. A CPUC cultural resources specialist will approve the demarked plans prior to start of construction.</p> <p>Prior to the start of construction activities within 100 feet of cultural resources, temporary fencing or signage will be erected, as feasible, with the approval of the CPUC. The temporary fencing or signage will be installed by or under the direct supervision of a qualified archaeologist. Fencing or signage will establish a 50-foot buffer (at minimum) from the boundary of the cultural resource site. If signs are erected, signage will not indicate that an Environmentally Sensitive Area contains cultural resources. All Environmentally Sensitive Areas will be avoided throughout construction and restoration of the proposed project to the maximum extent feasible. If a 50-foot buffer cannot be established or the areas cannot be</p>	Verify demarcation of environmentally sensitive areas and avoidance of known cultural resources.	During pre-construction, construction, and restoration..

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>avoided, no work will be conducted in the area until a CPUC-approved cultural resources consultant (MM CR-3) inspects the cultural resources. The CPUC-approved cultural resources consultant will communicate the findings to the SCE archaeologist who will make a preliminary determination regarding whether further investigation is required. SCE will then submit their recommendation to the CPUC for the CPUC's approval. If either SCE's cultural resources consultant or the CPUC's cultural resources consultant determines that further investigation is required, work will not be conducted in the area until testing and evaluation (MM CR-8) and, if necessary, data recovery (MM CR-9) are completed. Once construction in proximity to the Environmentally Sensitive Area is complete, the temporary fencing or signage will be removed.</p> <p>MM CR-3: Qualified Cultural Resources Consultants. The applicant will retain the services of qualified professional (CPUC-approved) cultural resources consultants who meet or exceed the U.S. Secretary of the Interior qualification standards for professional archaeologists published in 36 Code of Federal Regulations 61 and who have experience working in the jurisdictions traversed by components of the proposed project sufficient to identify the full range of cultural resources that may be found in the proposed project area. The consultants will also have knowledge of the cultural history of the proposed project area. The resumes and supporting information for each cultural resources consultant will be submitted to the CPUC for approval. At least one qualified cultural resources consultant must be approved</p>	Verify qualifications of cultural resources consultant.	During pre-construction.

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>by the CPUC prior to start of construction.</p> <p>MM CR-4: Cultural Resources Plan. Prior to construction, the applicant will submit Cultural Resources Plans for the respective project components, prepared by the approved consultant(s) (MM CR-3) for review and approval by the CPUC. The final Cultural Resources Plans shall be implemented, as specified, throughout construction and restoration. These plans will address cultural resources eligible for the CRHR that cannot be preserved by avoidance and to identify areas where monitoring of earth-disturbing activities is required. The monitoring plan applies to all site personnel and shall include, at a minimum:</p> <ul style="list-style-type: none"> • Requirements, as necessary, and plans for continued Native American involvement and outreach, including participation of Native American monitors during ground-disturbing activities as determined appropriate. • Brief identification and description of the general range of the resources that may be encountered. • Identification of the elements of a site that will lead to it meeting the definition of a cultural resource requiring protection and mitigation. • Identification and description of resource mitigation that will be undertaken if required. • Description of monitoring procedures that will take place for each project component area as required. • Description of how often monitoring will occur 	Review adequacy of plan and verify implementation of plan.	During pre-construction, construction, and restoration.

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>(e.g., full-time, part time, spot checking).</p> <ul style="list-style-type: none"> • Description of the circumstances that will result in the halting of work and a statement that either the archaeological monitor or the Native American Monitor is authorized to call for work to be stopped. • Description of the procedures for halting work and notification procedures for construction crews. • Description of procedures for curating any collected materials. • Reporting procedures. • Contact information for those to be notified or reported to. <p>MM CR-5: Native American Consultation and Participation Planning. Prior to construction, the applicant will provide evidence to the CPUC that tribes requesting consultation with the applicant regarding the project design and impacts on cultural resources were consulted at least 30 days prior to construction. In addition, the applicant will provide evidence to the CPUC that tribes that have expressed interest in the project during any phase (i.e., project application through end of construction and restoration) are given the opportunity to participate in additional cultural resources surveys (MM CR-1) and cultural resources monitoring when performed by a CPUC-approved cultural resources consultant (MM CR-3).</p> <p>To outline the expected duties and responsibilities of all</p>	<p>Verify consultation with interested Native American tribes. Review adequacy of plan and verify implementation of plan.</p>	<p>During pre-construction, construction, and restoration.</p>

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>parties involved, the applicant and a CPUC-approved cultural resources consultant will submit a Native American Participation Plan prior to construction. The final Native American Participation Plan shall be implemented, as specified, throughout construction and restoration. Tribes that have expressed interest in the project prior to construction will be given the opportunity to participate in development of the plan. At minimum, the plan will specify that:</p> <ul style="list-style-type: none"> • Native American monitors, if approved by a tribe, are expected to participate in worker environmental awareness and health and safety training and follow all health and safety protocols. • Attendance by Native American monitors during construction and restoration of the project is at the discretion of the tribe, and the absence of a Native American monitor, should the tribes choose to forgo monitoring for some reason, will not delay work. • The Native American monitors will have the ability to notify a CPUC-approved cultural resources consultant who has the authority to temporarily stop work (MM CR-7) if they find a cultural resource that may require recordation and evaluation. • Interpretation of a find will be requested from Native American monitors will have the opportunity to provide interpretation on the discovery, evaluation, or data recovery of unanticipated finds for inclusion in the final 		

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>Cultural Resources Report (MM CR-10).</p> <ul style="list-style-type: none"> The tribes involved with preparation of the Native American Participation Plan will be given the opportunity to participate in the development of Testing and Evaluation Plans (MM CR-8) and Data Recovery Plans (MM CR-9) if the development of these plans is required. Native American monitors approved by a tribe for monitoring work on the project will be notified 30 days prior to start of construction of the various project components. , SCE, in coordination with the CPUC, will help facilitate a mutually agreeable plan for participation. . Define a process to inform tribes of completed cultural surveys and to provide a copy of the survey to interested tribes. <p>MM CR-6: Construction Monitoring. Prior to construction, the applicant will retain qualified archaeologists as specified in the Cultural Resources Plans (MM CR-4) to monitor cultural resources mitigation and ground-disturbing activities in culturally sensitive areas during construction and restoration. The archaeological monitors will work under the supervision of the qualified cultural resources consultant unless the consultant serves as monitor, as well. The archaeological monitors' credentials must be submitted to CPUC for approval prior to the notice to proceed. These areas include the Quaternary alluvium, areas adjacent to sites CA-SBA-3587, CA-VEN-58, GANDA-1, and any other resources</p>	<p>Verify monitoring of ground-disturbing activities in culturally sensitive areas.</p>	<p>During construction and restoration.</p>

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>identified in the Cultural Resources Plan. The qualified archaeologists will attend preconstruction meetings to provide comments and/or suggestions concerning monitoring plans and discuss excavation plans with excavation contractors.</p> <p>MM CR-7: Stop Work for Unanticipated Cultural Resources Discoveries. In the event that previously unidentified cultural resources are uncovered during implementation of the project, SCE will ensure that ground-disturbing work is halted or diverted from the discovery to another location and will notify the CPUC and the appropriate authorities. The CPUC-approved cultural resources consultant will inspect the discovery and determine whether further investigation is required. If the discovery is significant but can be avoided, and no further impacts will occur, the resource will be documented and no further effort will be required. If the resource is significant but cannot be avoided, and may be subject to further impact, the CPUC-approved cultural resources consultant, in consultation with and under the direction of the qualified archaeologist, will evaluate the significance of the resource based on eligibility for the CRHR or local registers and implement appropriate measures in accordance with the Cultural Resources Plans.</p> <p>MM CR-8: Testing and Evaluation Plan. If any cultural resource is discovered during construction that cannot be avoided, work in the area of the find will be immediately halted as specified in MM CR-7. A CPUC-approved cultural consultant (MM CR-3) will determine if further investigation is required (MM CR-7). If so, the</p>	<p>Verify stop work and proper evaluation of unanticipated cultural resource discoveries.</p> <p>Review adequacy of plan and verify implementation of plan.</p>	<p>During construction and restoration.</p> <p>During construction and restoration.</p>

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>CPUC-approved cultural consultant will submit a Testing and Evaluation Plan to the CPUC for approval prior to further disturbance of the resource. The final Testing and Evaluation Plan shall be implemented, as specified, throughout construction and restoration. After testing and evaluation is completed, a report documenting the results will be submitted to the CPUC. If avoidance is recommended, the cultural resource will be avoided, to the maximum extent feasible. If avoidance is not possible, a Data Recovery Plan will be developed and implemented (MM CR-9).</p> <p>MM CR-9: Data Recovery Plan. If avoidance of a cultural resource found during project construction that is eligible for listing in the CRHR or local registers or as “unique” archaeological resources pursuant to CEQA is not feasible, a CPUC-approved cultural resources consultant (MM CR-3) (as applicable) will prepare a Data Recovery Plan that outlines the extent of excavation, recovery/salvage, curation, and recordation that will occur. The Data Recovery Plan will be submitted to the CPUC for approval prior to the start of any data recovery work. Data recovery will be completed as specified in the approved Data Recovery Plan prior to continuing work within the area of the find.</p> <p>MM CR-10: Cultural Resources Reporting. Prior to final inspection after construction of project components has been completed, the applicant’s qualified archaeologists as specified in the Cultural Resources Plans will submit reports to the CPUC summarizing all monitoring and mitigation activities and confirming that all mitigation measures have been implemented.</p> <p>MM CR-11: Paleontological Monitoring and Treatment Plan. Prior to start of construction, the applicant will</p>	<p>Review adequacy of plan and verify implementation of plan.</p> <p>Review adequacy of report.</p> <p>Review adequacy of plan.</p>	<p>During construction and restoration.</p> <p>During post-construction.</p> <p>During pre-construction, construction, and</p>

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>submit a Paleontological Monitoring and Treatment Plan for each project component that is prepared by a CPUC-approved paleontological consultant (MM CR-12) to the CPUC for approval. This plan will be adapted from the Society of Vertebrate Paleontology's Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources (2010) to specifically address each project component. In addition, the plan will, at minimum:</p> <ul style="list-style-type: none"> • Include a list of personnel to which the plan applies. • Describe the criteria used to determine whether an encountered resource is significant and if it should be avoided or recovered. • Identify construction and restoration impact areas of moderate to high sensitivity for encountering paleontological resources and the shallowest depths at which those resources may be encountered. • Describe methods of recovery, preparation, and analysis of specimens, final curation of specimens at a federally accredited repository, data analysis, and reporting. • Identify areas with moderate to high sensitivity for encountering paleontological resources and the shallowest depths at which those resources may be encountered. • Briefly identify and describe the types of paleontological resources that may be 		restoration.

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>encountered.</p> <ul style="list-style-type: none"> Identify the elements of a site that will lead to it requiring protection and mitigation and identify mitigation that will apply. Describe monitoring procedures that will take place for each component of the project that requires monitoring. Describe how often monitoring will occur (e.g., full-time, part time, spot checking), as well as the circumstances under which monitoring will be increased or decreased. Describe the circumstances that will result in the halting of work. Describe the procedures for halting work and notification procedures for construction and restoration crews. Describe procedures for curating any collected materials. Outline coordination strategies to ensure that CPUC-approved paleontological consultant (MM CR-12) conduct full-time monitoring of all grading activities in sediments determined to have a moderate to high sensitivity. Include reporting procedures. Include contact information for those to be notified or reported to. <p>For sediments of low or undetermined sensitivity, the</p>		

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>plan will specify what level of monitoring is necessary. Sediments with no sensitivity will not require paleontological monitoring. The plan will define specific conditions in which monitoring of earthwork activities could be reduced and/or depth criteria established to trigger monitoring. These factors will be defined by an approved (MM CR-12) paleontologist.</p> <p>MM CR-12: Qualified Paleontological Consultants. The applicant will retain the services of qualified professional paleontological consultants with knowledge of the local paleontology and the minimum levels of experience and expertise as defined by the Society of Vertebrate Paleontology's Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources (2010). The resumes and supporting information for each paleontological consultant will be submitted to the CPUC for approval. At least one qualified paleontological consultant must be approved by the CPUC prior to start of construction.</p> <p>MM CR-13: Paleontology Construction Monitoring. Based on the Paleontological Monitoring and Treatment Plans, SCE will conduct paleontological monitoring using CPUC-approved paleontological consultant (MM CR-12). This will include monitoring any ground-disturbing activity during construction and restoration in areas determined to have high paleontological sensitivity and that have the potential to be shallow enough to be adversely affected by such earthwork as determined by the CPUC-approved paleontological consultant.</p> <p>MM CR-14: Stop Work for Unanticipated Paleontological Discoveries. If previously unidentified paleontological resources are uncovered during implementation of the project, the applicant will ensure that ground-disturbing</p>	<p>Review adequacy of consultants.</p> <p>Review adequacy of monitoring.</p> <p>Review adequacy of monitoring.</p>	<p>During pre-construction, construction, and restoration</p> <p>During pre-construction, construction, and restoration</p> <p>During pre-construction, construction, and restoration</p>

Table 10-1 Draft Mitigation Monitoring Plan

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>work is halted or diverted from the discovery to another location. A CPUC-approved paleontological consultant will inspect the discovery and determine whether further investigation is required. If the discovery is significant but can be avoided, and no further impacts will occur, the resource will be documented in the appropriate paleontological resource records and no further effort will be required. If the resource is significant but cannot be avoided and may be subject to further impact, the CPUC-approved paleontological consultant (MM CR-12) will evaluate the significance of the resource and implement appropriate measures in accordance with the Paleontological Monitoring and Treatment Plans.</p> <p>MM CR-15: Cultural and Paleontological Resources Training Requirements. Prior to start of construction, all construction and restoration personnel involved in ground-disturbing activities and the supervision of such activities will undergo worker environmental awareness training. The cultural and paleontological resources training components of will be presented by a CPUC-approved cultural resources consultant (MM CR-3) and CPUC-approved paleontological consultant (MM CR-12). The training will describe the role of cultural and paleontological resources monitors; role of Native American monitors (if applicable); the types of cultural and paleontological resources that may be found in the proposed project area and how to recognize such resources; the protocols to be followed if cultural or paleontological resources are found, including communication protocols; and the laws relevant to the protection of cultural and paleontological resources and the associated penalties for breaking these laws. Additionally, prior to construction, CPUC-approved</p>	Review adequacy of training materials and verify implementation of training.	During pre-construction, construction, and restoration.

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	cultural and paleontological resources consultants will meet with the applicant's grading and excavation contractors to provide comments and suggestions concerning monitoring plans and to discuss excavation and grading plans.		
<i>Impact CR-2: Substantial adverse change in the significance of an archaeological resource.</i>	APM CUL-1: Avoidance, Minimization, and Mitigation. See above. APM CUL-3: See above. MM CR-1: Additional Cultural Resources Surveys. See above. MM CR-2: Avoid Known Cultural Resources. See above. MM CR-3: Qualified Cultural Resources Consultants. See above. MM CR-4: Cultural Resources Plan. See above. MM CR-5: Native American Consultation and Participation Planning. See above. MM CR-6: Construction Monitoring. See above. MM CR-7: Stop Work for Unanticipated Cultural Resources Discoveries. See above. MM CR-8: Testing and Evaluation Plan. See above. MM CR-9: Data Recovery Plan. See above. MM CR-10: Cultural Resources Reporting. See above. MM CR-15: Cultural and Paleontological Resources Training Requirements. See above.		
<i>Impact CR-3: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.</i>	APM CUL-2: Paleontological Resources Management Plan (PRMP). SCE shall prepare and implement a PRMP that would include, but not be limited to: preconstruction coordination; recommended monitoring methods; emergency discovery procedures; sampling and data	Review adequacy of plan and verify implementation of plan.	During pre-construction, construction, and restoration.

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>recovery methods, if needed; museum storage coordination for any specimens and data recovered; and reporting requirements. The PRMP would also provide for sediment screening, fossil preparation, curation, and preparation of a report detailing the results of the work.</p> <p>In addition, the PRMP would specify monitoring requirements such as the presence of a paleontological monitor when work is being performed at formations with high paleontological sensitivity. If very few or no fossil remains are found during ground-disturbing activities, monitoring time can be reduced or suspended entirely, per recommendations of the paleontological field supervisor.</p> <p>MM CR-11: Paleontological Monitoring and Treatment Plan. Prior to start of construction, the applicant will submit a Paleontological Monitoring and Treatment Plan for each project component that is prepared by a CPUC-approved paleontological consultant (MM CR-12) to the CPUC for approval. This plan will be adapted from the Society of Vertebrate Paleontology's Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources (2010) to specifically address each project component. In addition, the plan will, at minimum:</p> <ul style="list-style-type: none"> • Include a list of personnel to which the plan applies. • Describe the criteria used to determine whether an encountered resource is significant and if it should be avoided or recovered. • Identify construction and restoration impact 	Review adequacy of plan and verify implementation of plan.	During pre-construction, construction, and restoration.

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>areas of moderate to high sensitivity for encountering paleontological resources and the shallowest depths at which those resources may be encountered.</p> <ul style="list-style-type: none"> Describe methods of recovery, preparation, and analysis of specimens, final curation of specimens at a federally accredited repository, data analysis, and reporting. Identify areas with moderate to high sensitivity for encountering paleontological resources and the shallowest depths at which those resources may be encountered. Briefly identify and describe the types of paleontological resources that may be encountered. Identify the elements of a site that will lead to it requiring protection and mitigation and identify mitigation that will apply. Describe monitoring procedures that will take place for each component of the project that requires monitoring. Describe how often monitoring will occur (e.g., full-time, part time, spot checking), as well as the circumstances under which monitoring will be increased or decreased. Describe the circumstances that will result in the halting of work. Describe the procedures for halting work and notification procedures for construction and 		

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>restoration crews.</p> <ul style="list-style-type: none"> • Include testing and evaluation procedures for resources encountered. • Describe procedures for curating any collected materials. • Outline coordination strategies to ensure that CPUC-approved paleontological consultant (MM CR-12) conduct full-time monitoring of all grading activities in sediments determined to have a moderate to high sensitivity. • Include reporting procedures. • Include contact information for those to be notified or reported to. <p>For sediments of low or undetermined sensitivity, the plan will specify what level of monitoring is necessary. Sediments with no sensitivity will not require paleontological monitoring. The plan will define specific conditions in which monitoring of earthwork activities could be reduced and/or depth criteria established to trigger monitoring. These factors will be defined by an approved (MM CR-12) paleontologist.</p> <p>MM CR-12: Qualified Paleontological Consultants. The applicant will retain the services of qualified professional paleontological consultants with knowledge of the local paleontology and the minimum levels of experience and expertise as defined by the Society of Vertebrate Paleontology's Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources (2010). The resumes and supporting information for each paleontological consultant will be submitted to the CPUC for approval. At least one qualified</p>	<p>Verify qualifications of paleontological consultant.</p>	<p>During pre-construction.</p>

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>paleontological consultant must be approved by the CPUC prior to start of construction.</p> <p>MM CR-13: Paleontology Construction Monitoring. Based on the Paleontological Monitoring and Treatment Plans, SCE will conduct paleontological monitoring using CPUC-approved paleontological consultant (MM CR-12). This will include monitoring any ground-disturbing activity during construction and restoration in areas determined to have high paleontological sensitivity and that have the potential to be shallow enough to be adversely affected by such earthwork as determined by the CPUC-approved paleontological consultant.</p> <p>MM CR-14: Stop Work for Unanticipated Paleontological Discoveries. If previously unidentified paleontological resources are uncovered during implementation of the project, the applicant will ensure that ground-disturbing work is halted or diverted from the discovery to another location. A CPUC-approved paleontological consultant will inspect the discovery and determine whether further investigation is required. If the discovery is significant but can be avoided, and no further impacts will occur, the resource will be documented in the appropriate paleontological resource records and no further effort will be required. If the resource is significant but cannot be avoided and may be subject to further impact, the CPUC-approved paleontological consultant (MM CR-12) will evaluate the significance of the resource and implement appropriate measures in accordance with the Paleontological Monitoring and Treatment Plans.</p> <p>MM CR-15: Cultural and Paleontological Resources Training Requirements. See above.</p>	<p>Review adequacy of plan and verify implementation of plan.</p> <p>Verify stop work and proper evaluation of unanticipated paleontological discoveries.</p>	<p>During pre-construction, construction, and restoration.</p> <p>During construction and restoration.</p>

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
<i>Impact CR-4: Disturb any human remains, including those interred outside of formal cemeteries.</i>	APM CUL-1: Avoidance, Minimization, and Mitigation. See above. APM CUL-3: See above. MM CR-1: Additional Cultural Resources Surveys. See above. MM CR-2: Avoid Known Cultural Resources. See above. MM CR-3: Qualified Cultural Resources Consultants. See above. MM CR-4: Cultural Resources Plan. See above. MM CR-5: Native American Consultation and Participation Planning. See above. MM CR-6: Construction Monitoring. See above. MM CR-7: Stop Work for Unanticipated Cultural Resources Discoveries. See above. MM CR-8: Testing and Evaluation Plan. See above. MM CR-9: Data Recovery Plan. See above. MM CR-10: Cultural Resources Reporting. See above.		
4.6 Geology, Soils, and Mineral Resources			
<i>Impact GEO-1: Expose people or structures to risk of loss, injury, or death involving rupture of a known earthquake fault.</i>	APM GEO-1: Based on the findings of the geotechnical analysis, the applicant would design project components to minimize the potential for landslides, lateral spreading, subsidence, liquefaction, or collapse. Measures that may be used to minimize impacts could include, but are not limited to, stabilization fills, retaining walls, slope coverings, removal of unstable materials, avoidance of highly unstable areas, construction of pile foundations, ground improvements of liquefiable zones, installation of flexible bus connections, and incorporation of slack in	Verify implementation of recommendations from the geotechnical analysis.	During pre-construction.

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	cables.		
<i>Impact GEO-2: Expose people or structures to the risk of loss, injury, or death involving strong seismic ground shaking.</i>	APM GEO-1: See above.		
<i>Impact GEO-3: Expose people or structures to the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction.</i>	APM GEO-1: See above.		
<i>Impact GEO-4: Expose people or structures to the risk of loss, injury, or death involving landslides.</i>	APM GEO-1: See above. MM GEO-1: During operations, the applicant will conduct annual, or more often as needed maintenance patrols to identify areas of active slope instability and submit an annual report to the CPUC. Any areas of slope instability that could potentially affect project facilities (e.g., access roads, subtransmission structures, etc.) will be addressed on a case-by-case basis to minimize on- and off-site impacts.	Review adequacy of annual reports.	During operation.
<i>Impact GEO-6: Located on a geologic unit or soil that is or would become unstable and result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.</i>	APM GEO-1: See above. MM GEO-1: See above.		

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
<i>Impact GEO-7: Be located on expansive soil, creating substantial risks to life or property.</i>	APM GEO-1: See above.		
4.7 Greenhouse Gases			
No applicable APMs or mitigation measures.			
4.8 Hazards and Hazardous Materials			
<i>Impact HZ-1: Significant hazard from routine transport, use, or disposal of hazardous materials.</i>	<p>APM GEN-1: The applicant would develop a Worker Environmental Awareness Plan. The applicant would also prepare a presentation used to train all site personnel prior to the commencement of work. A record of all trained personnel would be kept.</p> <p>In addition to instruction on compliance with APMs and any mitigation measures identified, all construction personnel would also receive the following:</p> <ul style="list-style-type: none"> • A list of phone numbers for the applicant's environmental specialist personnel associated with the proposed project (archaeologist, biologist, environmental compliance coordinator, and regional spill response coordinator). • Instruction on the Santa Barbara County APCD and Ventura County APCD fugitive dust rules. • Instruction on biological resources (including special-status species and other sensitive habitats and resources that could occur in the vicinity of the proposed project); the locations of sensitive resources; the legal status and protection afforded these species; and the measures to be implemented for avoidance and minimization of impacts to the resources. Penalties for violations of environmental 	Review adequacy of training materials and verify implementation of training.	During pre-construction, construction, and restoration.

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>laws will also be incorporated into the training.</p> <ul style="list-style-type: none"> • A review of applicable local, state, and federal ordinances, laws, and regulations pertaining to historic preservation; a discussion of disciplinary and other actions that could be taken against persons violating historic preservation laws and the applicant policies; a review of archaeology, history, prehistory, Native American cultures, and paleontological resources in the proposed project vicinity; and instruction regarding what typical cultural resources look like. • Instruction regarding the procedures to be implemented should unanticipated cultural resources (as well as paleontological resources) be encountered during construction activities, including stopping work in the vicinity of the find and contacting the archaeologist or environmental compliance coordinator, who would provide guidance on how to proceed. • Instruction regarding the importance of maintaining a clean construction site, including ensuring that all food scraps, wrappers, food containers, cans, bottles, and other trash from the proposed project are deposited in closed trash containers. Trash containers would be removed from the project area as required and would not be permitted to overfill. • Instruction regarding the individual responsibilities under the Clean Water Act, the project SWPPP, site-specific BMPs, and the location of Material Safety Data Sheets for the proposed project. • Instructions to notify the foreman and regional spill 		

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>response coordinator in case of a hazardous materials spill or leak from equipment, or upon the discovery of soil or groundwater contamination.</p> <ul style="list-style-type: none"> • A copy of the truck routes to be used for material delivery. • Instruction that noncompliance with any laws, rules, regulations, or mitigation measures could result in being barred from participating in any remaining construction activities associated with the proposed project. 		
<i>Impact HZ-2: Significant hazard from accident conditions involving the release of hazardous materials.</i>	APM GEN-1: See above.		
<i>Impact HZ-3: Emit hazardous emissions or involve handling hazardous materials, substances, or waste within one-quarter miles of an existing or proposed school.</i>	APM GEN-1: See above.		
<i>Impact HZ-4: Be located on a site that is included on a list of hazardous materials sites.</i>	MM HZ-1: Contaminated Soil/Groundwater Contingency Plan. The applicant will submit a Contaminated Soil/Groundwater Contingency Plan prior to start of construction to address unanticipated unearthing or exposure of buried hazardous materials or contamination or contaminated groundwater. The final Contaminated Soil/Groundwater Contingency Plan shall be implemented, as specified, throughout construction and restoration. This plan will detail steps that the applicant or its contractor will take to prevent the spread of contamination, the sampling necessary if contamination	Review adequacy of plan and verify implementation of plan.	During pre-construction, construction, and restoration.

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>is discovered, and remedial action. At minimum, the plan will include the following:</p> <ol style="list-style-type: none"> 1. Contact information and procedures for federal, regional, and local agencies; the applicant's environmental coordinator(s) responsible for the cleanup of contaminated soil or groundwater; and licensed disposal facilities and haulers. 2. Procedures to minimize environmental impacts in the event that hazardous soils or other materials are encountered during construction, including stopping work; securing and marking the contaminated area; preventing the spread of contamination; testing; primary, secondary, and final cleanup procedures; and proper disposal in accordance with applicable laws and regulations. 3. Training requirements for construction workers performing excavation activities and identifying potentially hazardous contamination (e.g., stained or discolored soil and odor). 		
<i>Impact HZ-7: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.</i>	MM TT-1: Traffic Control Plan. See below.		
<i>Impact HZ-7: Expose people or structures to a significant risk involving wildland fires.</i>	MM HZ-2: Fire Control and Emergency Response Plan. Prior to construction, the applicant will develop and implement a Fire Control and Emergency Response Plan. The final Fire Control and Emergency Response Plan shall be implemented, as specified, throughout construction and restoration. This plan, and a record of	Review adequacy of plan and verify implementation of plan.	During pre-construction, construction, and restoration.

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>contact and coordination with local fire departments, will be submitted to the CPUC for review and approval prior to construction of the proposed project. The plan will describe fire prevention and response practices that the applicant will implement during construction and operation of the proposed project to minimize the risk of fire and, in the case of fire, provide for immediate suppression and notification. The plan will include:</p> <ul style="list-style-type: none"> • Fire prevention and response practices regarding the dispensing and storage of gasoline, diesel, and other fuels and combustible chemicals; power tool and equipment use; emergency access; fire suppression equipment and training; electrical grounding; and vegetation clearing; and • Communication protocols for on-site workers to coordinate with local agencies and emergency personnel and for the applicant's environmental health and safety personnel to coordinate with on-site workers in the event of fire, flood, or other emergencies or increased risk of emergency during construction or operation of the project. <p>The plan will define requirements for:</p> <ul style="list-style-type: none"> • Contacting CALFIRE at least two days prior to periods during which helicopters would be used to provide radio frequencies to be used by the helicopters; helicopter identifier data; and information about the number of helicopters to be used, dates of helicopter use, helicopter flight patterns, construction areas where helicopters would be used, and fueling and landing areas; 		

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<ul style="list-style-type: none"> Designating on-site fire patrol personnel who will monitor fire prevention activities during construction and have full authority to stop construction to prevent fire hazards; Reviewing the Fire Control and Emergency Response Plan with designated on-site fire patrol personnel and all other workers prior to commencing construction at each project area; Confining welding or blow torch activities to cleared areas having a minimum radius of 10 feet, measured from place of welding. If welding or blow torch activities occur within the right-of-way of the transmission or subtransmission line within High or Very High Fire Hazard Severity Zones as defined by CALFIRE, a fire patrol person will observe the operation; Prohibiting smoking at all work areas within High and Very High Fire Hazard Severity Zones as defined by CALFIRE during construction and operation of the project; Ensuring that all vehicles used for construction and operation of the project carry fire suppression equipment; The use of spark arrestors; Furnishing tools (e.g., shovels), equipment (e.g., fire extinguishers), and materials necessary to prevent fires, control the spread of fire if started, and providing assistance to extinguish fires started as a result of construction of the project; Providing the applicant's workforce and 		

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>equipment to extinguish uncontrolled fire near project work areas as directed by the USFS, CALFIRE, or local fire department representatives; and</p> <ul style="list-style-type: none"> • Ceasing any or all work activities, including helicopter use, as directed by the USFS, CALFIRE, or local fire department representatives in response to fire incidents. 		
4.9 Hydrology and Water Quality			
<i>Impact HY-1: Violate water quality standards.</i>	APM BIO-7: See above. APM GEO-1: See above.		
<i>Impact HY-6: Other substantial degradation of water quality.</i>	APM BIO-7: See above.		
<i>Impact HY-9: Risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow.</i>	APM GEO-1: See above.		
4.10 Land Use and Planning			
No applicable APMs or mitigation measures.			
4.11 Noise			
<i>Impact NS-1: Noise levels in excess of standards established in the local general plan or noise ordinance.</i>	APM NV-1: Construction activities will be conducted or phased to ensure that noise generated during construction would not exceed thresholds or durations identified by the City of Carpinteria Resolution No. 408; the County of Ventura noise regulations set forth in the County's Construction Noise Criteria and Control Plan; or the County of Santa Barbara Environmental Thresholds and Guidelines Manual. APM NV-2: Equipment and trucks used for the proposed	Verify noise levels. Verify utilization of noise	During construction and restoration. During construction and

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>project shall employ the best available noise control techniques to the extent feasible.</p> <p>MM NV-1: Noise Reduction and Control Practices. The applicant will employ a combination of the following noise reduction and control practices during the proposed 66-kV subtransmission line, telecommunication route installation, and substation work to ensure that the temporary increase in ambient noise will not exceed maximum allowable levels identified by the applicable jurisdiction, measured at the closest sensitive receptor property boundary:</p> <ul style="list-style-type: none"> • Construction equipment, stationary or mobile, will be equipped with properly operating and maintained mufflers on engine exhausts and compressor components. • The number and duration of construction equipment and vehicle idling on site will be limited, in accordance with APM AQ-2. • Temporary acoustic barriers or sound curtains (e.g., removable blankets or curtains made of composite materials that block and absorb noise) will be used along the perimeter wall of work areas as needed to reduce noise when construction activities occur within 200 feet of a sensitive receptor at any single location or within 1,600 feet of sensitive receptors for activities lasting more than 3 consecutive days at a single location. Noise barriers or sound curtains will be selected with a sound transmission class of 30 or greater, in accordance 	<p>control techniques on construction equipment and trucks.</p> <p>Verify implementation of measures.</p>	<p>restoration.</p> <p>During construction and restoration.</p>

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>with American Society for Testing and Materials Test Method E90. The noise absorbing material will be 2-inches thick and have a Noise Reduction Coefficient rating of 0.85 or greater, based on American Society for Testing and Material Method C423. The barrier height will be designed to break the line of sight and provide at least a 5-dBA insertion loss between the noise source and the closest sensitive receptor.</p> <ul style="list-style-type: none"> • Helicopter use during 66-kV subtransmission and overhead telecommunication line installations will avoid flying below 1,000 feet over sensitive receptors, when feasible. If helicopter use is required below 1,000 feet over sensitive receptors, the applicant will notify affected parties at least 48 hours prior to helicopter use. • Prior to the start of construction, the applicant shall prepare a Noise Control Plan for the construction of the proposed project. The applicant shall submit the Noise Control Plan to the CPUC at least 30 days prior to the start of construction for review and approval. The Noise Control Plan shall detail the frequency, location and methodology for noise monitoring prior to and during various construction activities to ensure that generated noise levels do not exceed the maximum allowable levels identified by the applicable jurisdiction. 		

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
<i>Impact NS-4: Substantial temporary or periodic increase in ambient noise levels in the project vicinity.</i>	<p>APM NV-1: See above.</p> <p>APM NV-2: See above.</p> <p>APM NV-3: Stationary sources shall be located as far from adjacent noise-sensitive receptors as reasonably possible and shall be enclosed if feasible.</p> <p>APM NV-4: Where feasible, temporary portable sound barriers would be deployed where construction noise would cause noise levels at sensitive receptor locations to be in excess of an applicable criteria threshold. For purposes of this APM, schools would only be considered sensitive receptor locations during instruction hours.</p> <p>APM NV-5: At least two weeks prior to the anticipated start of construction at a particular location, the applicant will notify all property owners within 300 feet of that location that construction activities are about to commence at that location.</p> <p>MM NV-1: Noise Reduction and Control Practices. See above.</p>	<p>Verify placement of stationary noise sources.</p> <p>Verify proper use of sound barriers.</p> <p>Verify property owner notification.</p>	<p>During construction and restoration.</p> <p>During construction and restoration.</p> <p>During pre-construction.</p>
4.12 Population and Housing			
No applicable APMs or mitigation measures.			
4.13 Public Services and Utilities			
<i>Impact PS-1: Result in substantial adverse physical impacts associated with new or physically altered governmental facilities.</i>	MM HZ-2: See above.		
<i>Impact PS-3: Insufficient water supplies available to serve the project from existing entitlements and resources or</i>	MM PS-1: Water Efficiency Plan. The applicant will make reasonable attempts to reduce overall water use and will reduce potable water use by at least 20 percent during drought conditions as declared by the State of California.	Review adequacy of plan and verify implementation of plan.	During construction and restoration.

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
<i>new or expanded entitlements required.</i>	The applicant will be required to research reclaimed water sources and acquire reclaimed water to the greatest extent practicable. The applicant will prepare and submit a Water Efficiency Plan to the CPUC for review and approval at least 60 days prior to construction. The Water Efficiency Plan will detail the applicant's water efficiency measures, including the use of reclaimed water, palliatives, alternative construction methods, or other measures proposed by the applicant. The Water Efficiency Plan will detail the applicant's attempts to secure reclaimed water. In the event that a sufficient supply of reclaimed water cannot be reasonably obtained, the applicant will provide a well-documented justification for any use of potable water to be used for construction activities. If, at any time during construction, the State Water Resources Control Board rescinds their Emergency Regulations (Resolution No. 2014-0038) due to a cessation of drought conditions in the State, the applicant may request that the CPUC rescind this mitigation measure. Alternatively, the applicant will need to revise their Water Efficiency Plan to remain in compliance with future adopted SWRCB regulations regarding water use during drought conditions.		
<i>Impact PS-6: Exceed Santa Barbara County's solid waste thresholds of 350 tons of construction and demolition debris.</i>	MM PS-2: Solid Waste Management Plan. The applicant will prepare and submit a Solid Waste Management Plan to the CPUC for review and approval prior to the start of construction. The County of Santa Barbara and the County of Ventura will also be provided the opportunity to review and provide comments on the plan. Santa Barbara County must approve plan language that relates to areas within its jurisdiction prior to project activities within the Santa Barbara Coastal Development Zone. The	Review adequacy of plan and verify implementation of plan.	During construction and restoration.

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>Solid Waste Management Plan will outline how the applicant will sort, measure, and record the disposal of solid waste to ensure that no more than 350 tons of solid waste is delivered to a Santa Barbara County operated solid waste disposal facility and that at least 60% (by weight) of construction debris will be diverted through either reuse or recycling. Measures in the plan will include, but will not be limited to:</p> <ul style="list-style-type: none"> • Provision of space and/or bins for appropriate storage of recyclable materials on site; • Establishment of a recyclable material pickup area; and • Development of a recordation system that details the amount of solid waste created, solid waste recycled (including soil recycling), and solid waste delivered to each solid waste disposal facility. <p>The plan will also detail reporting requirements to the CPUC, Santa Barbara County, and Ventura County. Reporting will include biannual progress reports as well as notification to Santa Barbara County if the project's capacity at Santa Barbara County operated solid waste disposal facilities is reached.</p>		
4.14 Recreation			
<i>Impact RE-2: Would the project disrupt access to existing recreation opportunities.</i>	MM RE-1: Notification of Trail Closure. The applicant shall provide users of the Ojai Valley Trail and the Franklin Trail with at least one week notice of expected trail closures and/or detours. The applicant shall coordinate with the City of Carpinteria Parks and Recreation Department, the County of Ventura Parks	Verify notification includes appropriate information and are posted on time, and remain in good condition.	During construction and restoration.

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Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
	<p>Department, the Santa Barbara County Parks Department, and the Land Trust for Santa Barbara County for their respective parks, to determine appropriate locations to post notifications, such as trailhead kiosks, access points, or the departments' websites. Notifications that are posted outside shall be protected from general weather conditions. Notifications shall include the following minimum information:</p> <ul style="list-style-type: none"> • The date the notification is posted; • General description of activities that are causing the closure; • Description (or map) of areas that will be affected by the closure; • The date (or date range) and time range that temporary closures will occur; • Approximate length of closure (i.e., will it be a series of 30 minute closures, or one 8-hour closure); and • Description (or map) of detour directions, if applicable. <p>The applicant shall provide a copy of the trail closure notification to the City of Carpinteria Parks and Recreation Department and the County of Ventura Parks Department, for their respective parks, and the CPUC on the same day that the notice is posted. The applicant shall regularly confirm that notifications remain posted and in good condition throughout the affected timeline.</p>		
4.15 Transportation and Traffic			
<i>Impact TT-1: Conflict with an</i>	MM TT-1: Traffic Control Plan. The applicant shall prepare Traffic Control Plan in accordance with the latest	Review adequacy of plan	During pre-construction,

Table 10-1 Draft Mitigation Monitoring Plan

Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs)	Monitoring Requirements	Timing
<i>applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system including, but not limited to, intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.</i>	<p>version of the California Joint Utility Traffic Control Manual prior to commencement of construction activities (California Inter-Utility Coordinating Committee 2010). The final Traffic Control Plan shall be implemented, as specified, throughout construction. The Traffic Control Plan shall be developed to minimize short-term construction-related impacts on local traffic (including motorists, bicyclists, and pedestrians) and potential traffic safety hazards, and shall include measures such as the installation of temporary warning signs at strategic locations near access locations for the project components. The signs shall be removed after construction-related activities are completed. The Traffic Control Plan would include, at a minimum, the measures listed below. The draft Traffic Control Plan shall be submitted to the regional office of the California Department of Transportation and applicable local jurisdictions for review and comment at least 60 days prior to the start of construction. The applicant shall address all agency comments prior to distributing the final Traffic Control Plan to all construction crew members and prior to commencement of construction activities. Specifically, the Traffic Control Plan would include the following:</p> <ul style="list-style-type: none"> • Installation of traffic control devices as specified in the California Joint Utility Traffic Control Manual; • Include a discussion of work hours, haul routes, work area delineation, traffic control and flagging; • Identify all access and parking restriction and 	and verify implementation of plan.	construction, and restoration.

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	<p>signage requirements;</p> <ul style="list-style-type: none"> Require workers to park personal vehicles at approved staging areas and take only necessary project vehicles to the work sites; Coordination with the City of Carpinteria, Carpinteria-Summerland Fire District, City of Ventura, County of Santa Barbara, or County of Ventura on any temporary land or road closures within their jurisdictions. Layout plans for notifications and a process for communication with affected residents and landowners prior to the start of construction. Advance public notification shall include posting of notices and appropriate signage of construction activities. The written notification shall include the construction schedule, the exact location and duration of activities within each street (i.e., which roads/lanes and access point/driveways/parking areas would be blocked on which days and for how long), and a toll-free telephone number for receiving questions or complaints; To ensure that the Traffic Control Plan reduces traffic impacts related to temporary lane closures along SR-192, SR-150, SR-33, the applicant will confer with the affected jurisdiction's traffic engineers and incorporate the engineer's recommendations into the Traffic Control Plan prior to commencing work; The Traffic Control Plan would also be submitted to all affected jurisdictions for review and 		

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	<p>approval prior to conducting construction activities;</p> <ul style="list-style-type: none"> Provisions for temporary alternate routes to route local traffic around construction zones; Delivery activities requiring extensive street use and temporary lane closures and/or lane reductions would be scheduled to occur during the off-peak hours to the extent feasible; Emergency service providers would be notified of the timing, location, and duration of construction activities. All roads would remain passable to emergency service vehicles at all times; and Identify all roadway locations where special construction techniques (e.g, night construction) would be used to minimize impacts to traffic flow. 		
<i>Impact TT-3: Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.</i>	<p>MM TT-2: Helicopter Safety Plan and External-Load Training. Prior to start of construction, the CPUC must approve a Helicopter Safety Plan developed by SCE or its contractors if helicopters are to be used for any aspect of construction of the project. All workers that shall be present when helicopters are in use for construction of the project shall be trained regarding helicopter external loads. A sign-in sheet recording the names and dates of all individuals trained shall be maintained by SCE. Helicopter Safety Plan and Worker Environmental Awareness training shall include the following, at minimum:</p> <ul style="list-style-type: none"> An overview of the general steps taken by the certified Rotorcraft External-Load Operators 	Review adequacy of plan and training. Verify implementation of plan and training.	During pre-construction, construction, and restoration.

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	<p>before starting operations, including a survey of the flight area; the typical ground worker instructions from certified Rotorcraft External-Load Operators; the ramp inspection checklist (14 CFR 133 Ramp Inspection Job Aid) and examples of typical causes of unsatisfactory ramp inspections; and the equipment typically required for Class A, B, C, and D loads as specified in 14 CFR 133;</p> <ul style="list-style-type: none"> • A summary of the contents of the FAA-approved Rotorcraft Load Combination Flight Manuals applicable to external-load operations planned for the project including maximum loads (internal and external) and load types and general performance capabilities, under approved operating procedures and limitations, for each type of helicopter to be used; • Detailed instruction regarding the proper methods of loading, rigging, or attaching external loads and examples of improper rigging and resultant accidents and incidents; and • Detailed information about planned helicopter construction techniques. <p>A safety brief, plan of operations, and refresher helicopter external-load operations training shall occur at the start of all days during which helicopter external-load operations are planned to occur. The planned flight paths, landing areas, and timing and types of helicopter construction activities for the day shall be presented. At minimum, the refresher training shall include examples load types and maximum loads (internal and external) for each type of helicopter to be used that day and a</p>		

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	<p>demonstration of proper external-load attaching and restraining means for all types of attaching and restraining devices that may be used.</p> <p>No SCE personnel or contractor, including helicopter pilots and crewmembers, shall work in proximity to or be involved with helicopter external-load operations unless they receive the initial training and attend the daily safety brief and refresher training. Signatures of all personnel and contractors that attend the daily safety brief and refresher training shall be collected and clear indication on the worker (e.g., sticker on the hardhat color-coded by training day) shall be visible to indicate that the worker, pilot, or crewperson is approved to work in proximity to or otherwise be involved with helicopter external-load operations for the day. Copies of all sign-in sheets and a list of topics covered during training shall be submitted to the CPUC.</p> <p>MM TT-3: Notification and Monitoring of Helicopter Use. SCE shall notify the Van Nuys Flight Standards District Office at least one week in advance of all days during which helicopter operations are planned to occur or as required by the Flight Standards District Office. In addition, SCE shall notify all residents, businesses, and owners of property within 0.25 miles of planned or emergency helicopter flight paths and landing areas at least one week in advance of all days during which helicopter operations are planned to occur.</p> <p>In compliance with 14 CFR Part 133, the loading and unloading of all helicopter external loads shall be monitored by lineman (non-apprentice) certified by SCE</p>	<p>Verify proper notification to Van Nuys Flight Standards District Office and surrounding residents, businesses, and owners of property. Verify monitoring of loading and unloading helicopter operations.</p>	<p>During construction and restoration.</p>

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	to rig and inspect helicopter external loads. All accidents or incidents reported to the National Transportation and Safety Board (NTSB) or FAA shall, at the same time of reporting, be reported to the CPUC. Near misses involving helicopters that had the potential to result in an accident or incident as defined by NTSB but do not require NTSB notification, shall be entered and described on a dated record by SCE and immediately reported to the applicant's safety coordinator and the CPUC.		
<i>Impact TT-4: Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).</i>	MM TT-1: Traffic Control Plan. See above.		
<i>Impact TT-5: Result in inadequate emergency access.</i>	MM TT-1: Traffic Control Plan. See above.		
<i>Impact TT-6: Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.</i>	MM TT-1: Traffic Control Plan. See above. MM TT-4: Repair of Damaged Trails. Prior to the start of construction, the applicant shall record the existing conditions of trails that could be physically damaged from the proposed construction activities. At the completion of construction, the applicant shall ensure that damage to existing trails as a direct result of activities related to construction of the proposed project components shall be repaired once construction is complete in accordance with local jurisdiction requirements and/or existing franchise agreements held by the applicant.	Review adequacy of plan and verify implementation of plan.	During pre-construction, construction, and restoration.

(End of Attachment)

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